

Herculaneum Lead Smelter Commenters

Site:	Herculaneum Lead
ID #:	MD000266323
Break:	L.O
Other:	ND

17 17 9D

1. Gina and Jerry Vinyard
2. Jack & Leslie Warden
3. Gregory G. Bieber
4. Sue Dawson
5. Peggy Cartee
6. Janet Johnson
7. Barbara Hill
8. Doe Run
9. Micaela C. King
10. Christine Laneman and Melvaline Fox
11. Newman Bronson & Wallis
12. Michael Whitter
13. Betty Black
14. Cathy Sullivan
15. W. Michael Pashia
16. Newman Bronson & Wallis
17. Margaret Brown
18. Ursuline Provincialate
19. Christine Laneman
20. George Garver

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SUPERFUND RECORDS

21. William Jeude
22. Debbie Curtis
23. Lynette Steidley-Toohey
24. James Donnelly, Jr
25. Paul Whaley
26. David Bailey
27. Christina McCoy
28. Carol Huckie-Keller
29. Alfred Wright
30. Glenda Dixon
31. Daryl Baiter
32. Barbara Hill
33. Christine Laneman and Melvaline Fox

Gina and Jerry Vinyard
263 Reservoir
Herculaneum, MO 63048

January 8, 2001

Diane Huffman
Environmental Protection Agency
Office of External Programs
901 North 5th Street
Kansas City, MO 66101

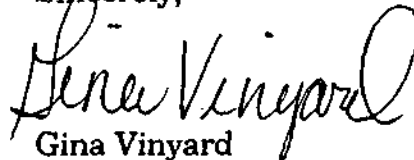
Re: *Administrative Order on Consent*

Dear Ms. Huffman:

I am writing regarding the Administrative Order on Consent. I believe that the comment period currently provided is inadequate for the residents of Herculaneum and other interested parties to respond and send in their written comments to the EPA. There is substantial technical information for the public to understand and the documents are not adequately available to the public. Please extend the comment period at least an additional thirty days, and preferably longer.

If any additional steps are needed to obtain a longer comment period please contact me immediately at my home address listed above.

Sincerely,


Gina Vinyard

COMMENT FORM

(1 of 4)

Herculaneum Lead Smelter Site

Herculaneum, Missouri

December 14, 2000

Jack & Leslie Warden

917 Dale

Herculaneum, MO 63048

Pursuant to both the information provided by and the information unable to be defined by the March 1999 "Preliminary Assessment Report", the "Administrative Consent Order" and during the December 14, 2000 meeting concerning the same, our first and foremost comment must be that we feel there absolutely should not be this type of industry operating in the very close proximity of such a residential area that exists here in Herculaneum near the Doe Run Lead Smelter due to the many chemical emissions and wastes hazards that present *"an imminent and substantial endangerment to human health or the environment"*. We feel this industry has been allowed to operate and monitor itself far too long without accountability, by the governmental bodies that be, and without adequate concern of and disclosure to the surrounding community.

In commenting exclusively on the "Administrative Consent Order" and we are formally making the following comments: Specifically referring to the "Statement of Work - Appendix A", *III. Air Emissions*, we note that no where in this order does it provide for additional air monitors in the areas most affected nor does it provide for more frequent and/or spontaneous readings of the existing monitors by any authorities other than the Doe Run Company itself.

a. We strongly urge immediate installation of additional lead, sulfur and cadmium monitors be added throughout Herculaneum, including but not limited to South Main, Church Street, Dale Street and Wood Street near the location of the slag pile, and the location of such monitors be determined and mandated by DNR and/or EPA, that said additional monitors be owned, maintained and read by a state agency and/or a representative of a state agency and NOT the Doe Run Company itself. Due to the fact the Doe Run Company operates 24 hours a day, seven days a week, these monitors should be read on a much more frequent basis on days and at times unannounced to the Doe Run Company. We strongly feel the current monitoring system is grossly inadequate and this is the only way to accurately determine whether the Doe Run Company is in actual compliance with emissions at ALL times to insure the safety of the Herculaneum residents.

b. We are also strongly recommending a program in which residents can report their suspicions and/or observations of possible emission violations or the location of possible contaminants found that will be investigated immediately by a third-party.

COMMENT FORM

(2 of 4)

Herculaneum Lead Smelter Site
Herculaneum, Missouri
December 14, 2000

Jack & Leslie Warden
917 Dale
Herculaneum, MO 63048

In commenting exclusively on the "Administrative Consent Order" and we are formally making the following comments: Specifically referring to the "Statement of Work - Appendix A",

II. Community Blood Levels, again we feel this order does not provide for any more of an aggressive attempt to identify and document current hazards and the effects of said hazards as they pertain to the health and safety of residents of Herculaneum.

a. We strongly feel while the funding for testing and education should be the responsibility of the Doe Run Company, the programs for the same should be conducted and/or presented through a reliable, reputable and unbiased third-party and NOT the Doe Run Company. Such testing and educational programs should include education of the Missouri Department of Health, our local public school systems and our city/county governments regarding *acute and chronic* lead exposure from *air emissions* and not limited to lead paint and lead in the soil. Furthermore, ALL the toxins/contaminants listed in the AOC (lead, cadmium, sulfur dioxide, arsenic, zinc, etc.) should routinely be addressed in all testing (blood, soil, air and water) and education.

b. Also, the testing of these toxins relating to the residents of Herculaneum should not be confined to the current age guidelines (children age six and under). All school-age children age 18 or younger residing in or attending school in Herculaneum should be tested for *lead and other noted toxins*, not only once a year, but at any time a suspicion, observation or medical diagnosis of the individual warrants such. Furthermore, testing/education should be strongly encouraged within the *adult* population to adequately identify and document any negative effects all such toxins are having on the *entire* residential population.

COMMENT FORM

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Herculaneum Lead Smelter Site

Herculaneum, Missouri

December 14, 2000

Jack & Leslie Warden

917 Dale

Herculaneum, MO 63048

In commenting exclusively on the "Administrative Consent Order" and we are formally making the following comments: Specifically referring to the "Statement of Work - Appendix A", I Community Soils: First and foremost, the AOC fails to address/acknowledge the sheer inconvenience/intrusion effect toxic clean up has on residents/families. Due to the length of time residential properties have been exposed to the toxins and the on-going exposures to said toxins named in the AOC, the reasonable risk that these toxins have invaded/saturated the residential structures inside as well as outside, the potential additional risks of exposures attributable to toxic clean up and the mere intrusive, life disrupting nature of such toxic clean up, guidelines should be established, where toxins are found to be in high levels, that residents should be given the option of enduring such procedures or negotiating the sale of their property to the Doe Run Company.

- a. Guidelines concerning procedures to restrict additional toxic exposures during the entire clean up process should be set. The local residents should be made aware of the proper procedures/protocol involving the entire toxic clean up process and all such information made readily available to the resident before any action is taken.
- b. We feel the current guideline of the top twelve (12) inch removal depth is inadequate; the top eighteen (18) inch removal depth should be the guideline to allow for safe gardens and all-around safer living environment.
- c. Guidelines/procedures set for the option of the resident, where high levels of toxins are found, to have the Doe Run Company fund the proper toxic clean up of their home's interior, including but not limited to vacuuming (HEPA vac) attics, basements, furniture, draperies, washing down walls, cabinets, shelving, replacement of flooring (i.e. carpeting), etc.
- d. Guidelines regarding truck traffic carrying contaminated soil and/or toxins need to be set, including but not limited to issues of proper disposal, diesel noise and exhaust, etc. being addressed as it pertains to the health, safety and general well-being of the local residents.
- e. We note this order many times stipulates "non-company owned property". We disagree with this stipulation in the circumstances whereas "company-owned property" is occupied by people (i.e. residential properties owned by Doe Run and utilized as rental property) or is used by the public (i.e. the property leased by the City of Herculaneum and utilized as a "City Park" and by the Tri-City Little League). Company-owned properties such as these should be tested and "cleaned up" as vigorously, if not more vigorously, due to the fact a wider population of people are exposed, i.e. children and persons from other cities utilizing these facilities. We strongly recommend complete old maps of the town of Herculaneum be provided by Doe Run and/or Bone Terre Farming & Cattle Company to identify the previous use of "non-company owned" property within the City of Herculaneum and to accurately identify "company-owned" property to determine whether these properties are routinely utilized by the public and therefore warrant proper clean up.

COMMENT FORM

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Herculaneum Lead Smelter Site

Herculaneum, Missouri

December 14, 2000

Jack & Leslie Warden

917 Dale

Herculaneum, MO 63048

In commenting exclusively on the "Administrative Consent Order" and we are formally making the following comments pertaining to general various/miscellaneous issues:

- a. Doe Run should provide and make public a written "Disaster Plan" as it pertains to potential effects on the surrounding community caused by any major accidental release of hazardous contaminants from their facility, including but not limited to alerting, protective measures, precautions.
- b. Protective measures/precautions for restriction of the Joachim Creek and the Mississippi River from commercial fishing, recreational fishing, fish consumption, drinking water consumption or body contact should be established until all measurements taken by state and federal authorities verify that there is no longer a risk to the public.
- c. Protective measures/precautions and/or testing and educational guidelines established to include any/all City Public Works Department employees that routinely (during the course of their employment with the City of Herculaneum) come in contact with or are exposed to contaminants listed in the AOC.
- d. Regular monthly or quarterly community meetings be held providing written progress reports to residents.

Gregory G. Nieber
453 Thurwell

(636) 475-3441

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Herculaneum MO 63048

I bought property in Henky in 1989. ~~The house was in pretty bad shape~~ With my wife EVE who ^{was} about 30 yrs old at that time my oldest son Dustin about 8 or so then & me 35 or so then. We all were basically in good health then. I was employed in the CATV industry, EVE a nurse & Dustin in 4th grade with good grades & attendance.

The house was in pretty sad shape with a lot of repairs needed & I was going to take the challenge & I thought opportunity to improve our lives some what with a home of our own. I had to make some basic repairs before occupying the residence to meet local building inspections. I.E. plumbing, Electrical windows etc. Upon completing these in the first month we obtained building inspections & moved in. There was still much to do, walls were in bad shape, floors unfinished, broken concrete, old heating system with 12" duct running all over basement. So I began consistently renovating as we lived in the home, one area at a time. Upon removing some of the old duct & heater the was real black soot over & inside all the pipes & in the flv. naturally I thought due to heating & Airflow. I would come out of the basement looking like a coal miner. After that I started ripping out some of the walls & redoing them. Well guess what the same black soot in the walls. Same same

After that I got involved in floor tile + carpet removal, guess what, black again. OK there some reason for all this but I don't get it yet. Next I had a brain storm to put in an attic fan so with trusty saw in hand I started cutting a hole in the dining room ceiling & boy did I take a bath in that same old blacksoot. It was & still is so thick up there that theres no way anyone ~~could~~ could go up there without choking to death. I'm still ignorant to what or why this place is so damn dirty. Well anyway that old concrete patio in the back of the house that is all cracked up. I decided to remove & replace with new concrete. So with sledgy hammer & pick in hand I go to work. As I'm busting up the old concrete my pick keeps coming out with black dirt on it. The more concrete I remove the more it becomes visible to me that there is some kind of leveling of sand on something all underneath this. When removed, yep, there it all is this beautiful black sand about a foot or more deep leveling & used for footing for the concrete. I was rather curious about it so I ASKED a neighbor who had been living here since the 60s about it. That was when I got woke up

to the case of Herculaneum. He told me that it was slag from the lead smelter. That they use to use it for all kinds of neat stuff around here. Sinders on the street in the snow, leveling yards, leveling concrete, filling in holes, base for driveways. Just about Everything where rock or chert was needed cause it was free, & there was lots of it. I asked him if this might ~~be my stop at the street~~

have anything to do with the black soot in the basement, attic & even in the walls.

Bill said that when he moved here in the 60s even in the 70s still, that a lot of times the fog & smoke from the lead smelter was so thick that you couldn't even see the neighbour's house hardly. I guess that would account for why that old house of mine was so filthy.

Anyway, I guess it still didn't quite register in my head, due to ignorance to it, that over the past 2 years working on this house with me & my family ^{in it} was having adverse affects on all our lives.

Somewhere over the next couple years Dustins grades startency falling off & his zest for life seemed to fade. He said he had cramps in his hands a lot, that he didn't understand what they were saying @ school, because

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depressed, & ~~eventually~~ eventually dropped out @ 15. He still doesn't quite concentrate to well has a very hard time understanding simple instructions, his sight is poor, ~~has~~ has a slight heart murmur & a short temper. He has been tested for lead & does have it in his body.

I have given up my technical career due to sore joints, tiredness, depression, Alcoholism drug Abuse, I was advised by a doctor about 5 years ago to find a new kind of work I have been doing the same thing for 20 years plus. I said he thought I had Arthritis in my back, shoulders, legs, knees, etc. No real explanation for the tiredness & probably drinking & druging to deny problems? I been straight & sober for 5 years, I eat a lot of vitamins & Exercise. Have sought counseling but still have a lot of physical pain & Am still low on energy. ~~I~~ I had a lead test & yep.

My wife basically had the same syptoms & problems. We both still lay in bed at night with back & joint problems. Its like a real deep ache, along with a lot of head aches. Unexplainable pains & thought confussion, With some times leads to a lot of frustration.

(6)

last but not least, in 1997 my wife —
became pregnant & we were blessed in May
with Dylan. Dylan has been tested several
times for lead by Jefferson Cnt Health Dept.
He has been as high as 17 tent before.
The nurse told us he is going to have
learning disabilities due to it. He's
A beautiful little boy like Dust was. They
say he will never live to his potential due
to the lead. What A Shame That's Doe
Run.

Anyway, I have ~~tryed~~ tried selling our house
on 3 occasions, ~~then~~ No go. Now the EPA is
here, good & bad. Maybe they'll make Doe Run
Accountable, but selling the house now is next to
impossible due to delivante documentation of
Environmental problems in Area, who would buy
it now?

I won't try to blame all of life's problems
on lead, some things or due to bad choices, that
is true, but it makes you wonder what kind
of choices we would make if some bugs (~~can~~
pain, confusion, stress & health worry) weren't biting
you in the butt.

I hope that this brief description
of what is at stake here, this circle has
been going on here for generations, ~~of the town~~

Lead is a silent killer, in more ways than you can imagine. We have no recourse of action; but if someone would have given me the information I have now, when I just bought an old house some 10 yrs ago, perhaps things could have been different. You people have a large responsibility set upon you. Don't let the whitewash of what seems to be fool you. Look close at these people & recognize the circle, even generational it's not normal it's not do to Etirical, Economic, or any other synario, its lead.

Thank You
Gregory G. Bieber

P.S. I know I've gotten to personal perhaps in this, perhaps to opinionated, and for some somewhat prejudice please excuse me. but this is a very serious matter. If I can help you in anyway please feel free to contact me.

COMMENT FORM

**Herculaneum Lead Smelter Site
Herculaneum, Missouri
December 14, 2000**

Name: Sue Dawson

Address: 310 Main Str.

Herculaneum, MO 63048

Comment: I think that Doe Run should be responsible for clean-up of any contaminants such^{as} lead, slag, etc. I am glad that the EPA, Health Dept. and other agencies have stepped in to see that Doe Run cleans up Herculaneum plus surrounding communities.

My youngest son Tommy Dawson had a high lead count at the age of 6 months. The Health Dept stepped in and tested the yard plus other places. The yard tested around 2,400 in 1994. Even though I live outside the 1/4-1/2 mile radius, I would like to have my yard replaced with less contaminated soil as soon as possible. The distance that I live from the plant should not influence when I get my yard done. My son is now 7 yrs. old
(Continue comment on back if necessary) but likes to play in the dirt.

January 8, 2001.

Ms. Diane Huffman
Environmental Protection Agency
Office of External Programs
901 N. 5th Street
Kansas City, MO 66101

Dear Ms. Huffman:

Below are "Comments on the Administrative Order on Consent" in the matter of The Doe Run Resources Corporation, Herculaneum, MO

Please acknowledge and enter these comments into record:

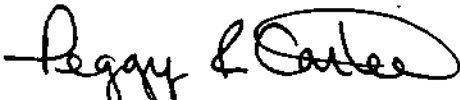
- A. The Doe Run Resources Corporation should be made to wash down the streets on the truck route everytime it rains, if not more. There is a trail of lead dust that leads from the plant out onto the streets that is not only dirty and disgusting, but also hazardous when it gets into our homes.
- B. The "Comment Period" should be extended to another 90 days for the Herculaneum residents to have time to read the Order and respond in a timely manner.
- C. Every home that has had the dirt removed should be given the opportunity to have sod put back down. My yard was one big mud hole and my swimming pool was a filthy mess the whole summer because the grass would not grow and it still is a disgrace. This should be at the expense of the Doe Run Resources Corporation.
- D. I think every home that is close to the plant should be given the opportunity to have their carpets replaced or have wooden floors put down. Why put carpet back into the home if the lead dust is still going to be a problem? This should be an expense for the Doe Run Resources Corporation.
- E. When there is an acid spill at the plant, the public should be made aware of it immediately. If the vehicles have acid damage on them, the Doe Run Resources Cororation should automatically initiate resanding and repainting of the vehicles. If the acid spills occur again, then the same vehicles should be taken care of again. Right now if you have acid damage on your vehicle, the Doe Run Resources Corporation will pay for your vehicle to be repainted, but you have to sign a waiver stating that there can be no more claims on this particular vehicle. It is not the vehicle owner's fault if the plant has another spill after the vehicle has been repainted.
- F. There should be a monitor that is read dally for air emissions and toxins. The "every 6th day" reading is bogus. Who could believe those readings?
- G. The soils should be tested for other contaminants besides lead, such as cadmium and zinc. The public should also be made aware of how the testing is to be done, and who is reading the results.
- H. We as residents should be able to call a toll-free hotline if any problematic or suspicious activity is witnessed, and then there should be immediate responses to the call. The caller should be

made aware of the findings of the problem or suspicious activity, in-writing ASAP.

- I I would like to grow a vegetable garden, but it is not healthy to do so at this time. Maybe the Doe Run Resources Corporation should buy us fresh vegetables on a daily basis since we cannot grow our own, due to the contamination of our soil by The Doe Run Resources Corporation.
- J The Health Department should not only target children 6 and under, but also children 18 and under. The community of Herculaneum is not only made up of children 6 and under. Older adults should also be taken care of and the Doe Run Resources Corporation be held accountable for the health problems that adults and older children have endured. The school district should hold a health screening and have all children tested for lead levels, at the expense of the Doe Run Company.

I would greatly appreciate the EPA taking my comments seriously. It has been a long time coming, but hopefully the Doe Run Resources Corporation will be held accountable for their actions and the health risks and problems that they have caused the citizens of Herculaneum.

Sincerely,



Peggy R. Cartee
946 Church Street
Herculaneum, MO 63048

cc:file

January 8, 2001

Ms. Diane Huffman
Environmental Protection Agency
Office of External Programs
901 N. 5th Street
Kansas City, MO 66101

Re: Administrative Order on Consent – The Doe Run Resources Corporation, Herculaneum

Dear Ms. Huffman:

Below are "Comments on the Administrative Order on Consent" in the Matter of the Doe Run Resources Corporation, Herculaneum, MO.

Please enter these comments into record:

1. The following provisions should be implemented regarding the removal of top soil and the application of grass seed on the lawn.
 - a. Anyone with small children should have the option of sod vs. grass seed due to the potential of tracking in not only replaced soil but also the potential residue that escapes the removal of contaminated soil. Not even to mention the hardship the muddy mess of children tracking the dirt in even if there weren't any contaminated residue. The fault of this contaminated soil does not lie with the homeowner but rather it lies with The Doe Run Resources Corporation for this health risk. Therefore, the removal and replacement should be as less disrupting as possible to the families involved.
2. The public should be made aware where the dirt will be dumped and where the new soil is coming from.
3. The company who performs this maneuver should be courteous to the homeowner respecting their inconvenience regarding this operation, and if necessary, should be offered separate accommodations
4. The trucks should be tightly covered and hosed down with water during this time.
5. The acknowledgment of young adults and adults through ignorance of the effect of lead in the body did not or were not afforded the opportunity to be tested, be acknowledged for the effects of lead on their health through: school performance and or difficulties in childhood.
6. A comparison study should be made related to the % of cancer per capita as apposed to an environment without a plant of this magnitude.
7. A continuous monitor by the state and not by The Doe Run Resources Corporation should be utilized to record the emissions expelled through the smoke stack and slag pile during off hours and holidays.
8. A continuous monitor for the drinking water.
9. A project manager should be on site to oversee the safe removal of contaminated soil.
10. When there is a complaint, The Doe Run Resources Corporation pays for the resanding and repainting of vehicles in the vicinity of the plant due to the toxins being emitted from the plant smoke stack. Therefore, if these toxins are literally eating into the metals and finishing of our vehicles, what is the effect on our bodies? There need to be a quick study on these effect on us.
11. The contamination of the Joachim Creek and Mississippi River should be studied and something done about.
12. The people involved in the overseeing of these clean ups should not be in any way, past or future, be affiliated with The Doe Run Resources Corporation.
13. The comment period should be extended at least another 60 days for the public to read the Order and respond.

I hope that these comments are taken into consideration as they are the responses of several people in this community. It is imperative that The Doe Run Resources Corporation be held accountable for their negligence.

Respectfully submitted,

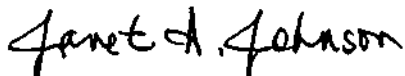
Janet A. Johnson

Janet A. Johnson
325 Wood Street
Herculaneum, MO 63048

Cc:file

I hope that these comments are taken into consideration as they are the responses of several people in this community. It is imperative that The Doe Run Resources Corporation be held accountable for their negligence.

Respectfully submitted,

A handwritten signature in cursive script that reads "Janet A. Johnson".

Janet A. Johnson
325 Wood Street
Herculaneum, MO 63048

Cc:file

Dianne Huffman
Environmental Protection Agency
Office of External Programs
Kansas City, KS 66101

January 1, 2001

I read today in The Leader that the public was invited to a meeting on December 14, 2000 to discuss the Doe Run Company environmental issues. I grew up in Herculaneum and am a current resident of Herculaneum but I had no knowledge of the meeting. I checked at City Hall requesting a copy of the State Implementation Plan and all they could give me were two binders which did not contain the proposed SIP. I called Mr. Lanzafame's office (he is on vacation until Jan 8th) and offices of The Leader (Patrick Martin is also on vacation) but no copy of the SIP was available. I would like to comment about my perception of the Doe Run Company and what I think of another SIP.

In order for you to evaluate my contribution, let me tell you that I have a B.S. in Biology and General Science/Chemistry and a M.A. in Biology. I am retired from the Department of Defense School System where I taught (18 years), administered in Elementary and High Schools (4 years) and served as a Business Manager for the District (8 years) prior to 1993 when I returned to Herculaneum to live with my elderly mother. I am currently serving my fourth term as the elected Municipal Judge for Herculaneum.

I have reviewed the March 30, 1999 Preliminary Assessment prepared by V. Wilder as well as many other documents relative to the Doe Run Company.

I am aware that Doe Run first started this SIP business with the Department of Natural Resources in 1980 and renewed it in 1984, 1990, 1993, 1998 and I guess is attempting it again in 2001. By my math, that is 20 years already. The big question is: is a SIP of any value to the average citizen or are SIPs just a means for industry to pretend to be doing something while continuing business as usual? For the largest American Lead Smelter, which has been in existence for 108 years and on a SIP for the past twenty there has been little significant positive change with regard to its environmental impact. Doe Run will continue to delay implementation of any significant improvements **as long as it is allowed**. For six out of eight years (between '88 & '96) Doe Run has been the largest emitter and between '92 & '96 ASARCO lead smelter (owned by Doe Run) was the largest emitter in Missouri according to TRI. I am aware that the company has complied with minimal voluntary standards but has never complied with the National Ambient Air Quality Standards (NAAQS). It has violated its Discharge Permit for **failing to meet effluent limits** based on D M R's. It has consistently defined itself as a small quantity generator of hazardous waste in order to get around the requirements for compliance for a large quantity generator. Its effluent continues to **kill wildlife and perhaps poison human water supplies**.

I am extremely concerned about the local water supply as the Cities of Herculaneum and Festus have a federal grant to drill wells under the Mississippi River to obtain drinking water for residents. If Doe Run pollutants leach into the water supply, it will be too late to pretend ignorance. Reports to date acknowledge that we **do not fully understand the**

effects of extensive pumping but we know that the New Madrid fault line has affected aquifers in eastern Missouri. Conclusions in various documents about these problems keep repeating that "...water supplies are not expected to be threatened by potential contaminant releases..." but, I contend that **this is not good enough**.

Doe Run has done **nothing** to solve the problem of slag storage. The Department of the Army Corps of Engineers has informed Doe Run that the Corps defines slag as a "waste product" not a fill material as Doe Run would prefer it be called.

The Company touts its soil replacement program while **continuing to pollute the soil**. The replacement may be helpful short term but a **Doe Run Management person has admitted to me that the soil replacement program is primarily window dressing to keep the EPA off its back**. Note that the new lawns have not been placed on a continuing schedule for testing. Without periodic testing of the new lawns, how do we know that this program is being successful? **Some blood testing** of children and pregnant mothers is being done but not nearly enough. Mr. Lanzafame suggests that lower levels of household dust would be helpful in reducing levels of lead in children while the Company changed from rail (although the rail line leads directly into the Doe Run plant) to almost complete reliance on trucking of its **concentrate and shipping of its products**. Citizens have asked Doe Run to build a truck route but the Company doesn't want to spend the money to build a bridge over Joachim creek. Thus, the trucks travel through the residential areas of the city. The Company knows that most of the trucks travel along streets where citizens are black and perhaps not well educated enough nor affluent enough to mount a significant resistance. The **dust** created by the extensive trucking is just one problem. The dust on the windowsills is phenomenal. When you try to sweep it off or wipe it off, you can taste the lead. The **diesel fuel exhaust** from the trucks is terrible and the **noise** is overwhelming. There has been no testing of the pollution being caused by the trucking operations which continue for about 20 hours per day. Wilder says that 7 to 8 rail cars per day supply concentrate to the plant. This is in error. I understand that the rails will not transport the concentrate for fear of environmental pollution along the tracks and for which Doe Run has refused to accept responsibility.

Doe Run responds to complaints about the trucks by saying that they have received no other (than the one complaining) complaints. They keep no records of complaints. It responds to complaints about truck traffic all day and night by saying that it doesn't weigh trucks until 6am (the assumption hoped for is that trucks don't come into town until that time which is false). What it doesn't say is that it allows trucks carrying concentrate as well as any others to come into its facility at all hours and line up for opening time. So, what is happening along the Missouri highways and streets of Herculaneum? We need a mandatory testing program run by an outside agency to test for **pollution caused by the trucking**. Almost everything that Doe Run uses or produces, from paper for the office to sulfuric acid trucks, to building materials etc. comes into the plant by truck. Lead and other products leave the plant by truck also although there is a barge loading dock on the Mississippi River at the plant. Cars have had their paint destroyed by leaking sulfuric acid from trucks. The Company counters these complaints

with a statement about sweeping the streets. Well, Doe Run does have a sweeper. But, it creates additional dust and noise! Most of the time, the sweeper is not in good repair. The hydraulic system went out one day spewing hydraulic fluid from the bridge over Joachim St. to the plant. Brown and Station streets had to be shut down while Doe Run tried to soak up the hydraulic fluid. The sweeper operator sprays water and sometimes lowers brushes to sweep with while at other times it uses only the vacuuming action. It usually sweeps on weekends so the truck traffic is not impeded.

The Company also touts its new higher, concrete smokestack. One only has to go outside about 9:30 pm to see the clouds of smoke billowing up from the plant. This also happens on Saturdays and Sundays sometimes. Perhaps these emissions are relative to the six day monitoring schedule. One need to note that there are **three schools with attendant sports playing fields within a half mile to a mile or so of the plant and three or more schools within five miles.** The residue left by these emissions is everywhere. The acrid smell of lead and the fumes of sulfide gas are gagging. I have on occasion, called Doe Run to complain about the acrid gas. I'm told that they will check. I know that they can shut that baghouse down immediately but they delay as long as possible. When I call the EPA, I get something like, "Is there an easterly wind?" What this question really tells me is that the EPA ascribes to the philosophy that there is no pollution if there is no one to smell it. It doesn't matter what direction the wind is. The fact is that Doe Run is emitting pollutants into the air that we all breathe.

So why haven't the local people made more of a fuss? One reason is lack of knowledge. Another is that **like most American citizens, we expect our elected officials and government employees in appropriate positions to protect our health and welfare.** Most citizens do not know of the seriousness of the violations. And a major problem is that Doe Run contributes about a quarter of a million dollars to the City in taxes (although it has been challenging in court an increase in the tax assessment) yearly. It provides jobs for about twenty persons from Herculaneum (all others are from elsewhere). The people of Herculaneum are afraid to complain for fear of losing this funding. Citizens also worry about Doe Run shutting down and leaving this greatly contaminated site on our doorstep. But the bigger question is: **can we afford to allow these kinds of violations to continue with no steady and measurable improvement?**

I sincerely believe that not until the government shuts Doe Run down (even temporarily) for its violations will this Company ever meet National and State standards. Continuation of past policy will not do the trick. I understand that local citizens met with Congressman, Richard Gephardt complaining about the Doe Run Company. I was not a part of that meeting but citizens were asking for action to stop the pollution.

Some actions (paid for by the Doe Run Company) that might improve the situation are:

Metallic Minerals Waste Management Area Permit and NPDES for Joachim Creek: The permits should be refused. Doe Run should be forced to remove the slag and all other solid contaminants within a short period of time. The water in Joachim

Creek should be tested for all contaminants before the cleanup starts and at periodic intervals during the removal and at periodic intervals after the solid waste is gone.

There should be **no permit** issued relative to discharging **storm water** into Joachim Creek due to the effects of contaminants on the wildlife of the area around Joachim Creek. People come from as far as St. Louis to fish in this creek. Locals use it extensively for fishing and other water sports also. People do consume the fish taken as there have never been any restrictions placed upon taking fish from this stream. Testing (for every contaminant discharged) should be required **every time** the Mississippi River backs up into Joachim Creek, and **every time** excessive rain or snow melt causes the creek to get out of its banks upstream to the bridge over Joachim Street where the city parks and ballfields are located.

Doe Run should be closed down if it does not meet the NAAQS. The EPA should require seven days per week and twenty-four hours per day testing. Also, testing along the west and east sides of the Mississippi River should be required on the same schedule.

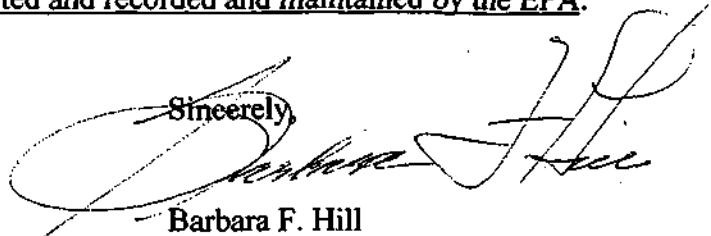
All **hazardous** materials required by or produced by the Doe Run Company should be moved in and out exclusively by rail or barge. Alternately, Doe Run should be required to build a truck route and bridge over Joachim Creek on its own property south of the plant.

Extensive testing should be done to make certain that drinking water supplies are not negatively impacted by any activities of the Doe Run Company prior to issuing any permits for discharge or stockpiling of contaminants.

Toxicological studies (beyond the small amount of blood testing) should be done to determine if long and/or short-term exposures to any/all of the hazardous contaminants produced by Doe Run have caused health problems to citizens of the area. There is a group of citizens who are concerned that contaminants are a cause of muscular ailments. The number of local persons suffering from these conditions appears to be higher than experienced by the population as a whole.

All testing should be contracted out to independent university, state or national agencies with all results being reported and recorded and maintained by the EPA.

Sincerely,



Barbara F. Hill
747 Brown St.
Herculaneum, Mo. 63048
(636) 479 5652

**THE
DOE RUN
COMPANY**

SMELTING DIVISION

James M. Lanzafame
Environmental Manager

00 DEC 27 PM 1:56
ENVIRONMENTAL PROTECTION
AGENCY-REGION VII
REGIONAL HEARING CLERK

December 21, 2000

Regional Hearing Clerk
U.S. EPA Region VII
901 N 5TH ST
Kansas City, KS 66101

Re: The Doe Run Resources Corporation, 881 Main St., Herculaneum, Missouri
Docket No. CERCLA 7-2000-0029
Docket No. RCRA 7-2000-0018

Dear Sir/Madam,

This letter is concerning what I consider to be some overlooked information that should have been included in the "Factual Findings" section of the AOC. I would like to add the following to the factual findings of the AOC.

Under Item 27 it is factual that The Doe Run Company has a total of 7 monitoring locations in place today. The Ursuline location to our South has over 19 years of continuous attainment data. The Golf Course monitor to our East has over 19 years of continuous attainment data. The Bluff monitoring station to our North has over 3 years of continuous attainment data. The Sherman monitoring station to our North has over 10 years of continuous attainment data. The North Station to our North has over 11 years of continuous attainment data. The High School to our Northwest has over 3 years of continuous attainment data. Concerning the second quarter of 2000, there is a difference in the average obtained by the State's monitor and our own monitor. Our monitor had more samples for the quarter and therefore should be more representative of the actual quarterly average at 1.2 ug Pb/m3. To indicate that the City of Herculaneum is in non-attainment with the ambient air lead standard is an over estimation of the non-attainment area at best. We are committed to achieving attainment at the last station.

Under Item 31 you mention the previous blood lead studies conducted around the Herculaneum facility. The health departments of the State of Missouri and Jefferson County completed a blood lead screening of 92% of the children within 1.5 miles of the facility between the ages of 0 and 6 years in mid-August 2000. We are not aware of any other community in the State of Missouri that has achieved such a high level of screening. The geometric mean average of those children was 5.4 ug Pb/100 g of whole blood. This is a 39% decrease from the previous study we voluntarily sponsored in 1992. The number

of children with blood leads greater than 10 was only 9, or about 15%. Based on data collected by the Missouri Department of Health we are aware of a metropolitan area that has recorded 24% (3,579) of their children at 10 and above without the presence of such a facility as ours. Another metropolitan area Health Department's website on the other side of the state estimates their number of children at 10 or above to be about 13%. Again, unrelated to the presence of such a facility as ours.

Under Item 54 a "summary" of the groundwater monitoring data was given concerning data collected around our slag storage area. The four most recent quarters of groundwater monitoring data were not mentioned in that summary. Based on advice received from EPA during the AOC discussions, Doe Run has moved to total metal analysis and a modified bailing procedure. The data was delivered to Mr. Tony Petruska, US EPA Region VII, Mr. Dave Mosby, MDNR-Superfund Section, and Mr. Larry P. Koen, Missouri Director of Land Reclamation Program starting in April of this year through the end of this year. It is our understanding that the total metal analysis contained in these reports were all essentially under the drinking water standard which is considered safe for consumption.

We believe it is in the interest of all parties to be aware of the most recent information. We look forward to your response to our comments. Should you have any questions, please feel free to contact me at (636) 933-3143.

Sincerely,



James M. Lanzafame
Environmental Manager

COMMENT FORM

Herculaneum Lead Smelter Site
Herculaneum, Missouri
December 14, 2000

Name: Micaela C. King
Address: 334 Curved ST
HERCULANEUM, MO 63048
(636) 479 6238

Comment: If we would have known about the lead
near the house in May 1971 we would have never
brought it in a night worker person in the spring,
summer & early part of fall around 1130 pm & 1200. I do
the washing & like to hang them out if smell so bad
you can't see the pollution very thick white smoke you cannot
even breathe. I've called the security gate so shut it
off and they say O.K but they don't do nothing. I've
called them at least 6 to 7 times this year. The window
seals & the siding is full of black stuffs you can
run the fingers & they come out black. Even when
is nice and I would like to open the windows to
breathe fresh air I cannot the smog gets in your
throat & cannot breathe. As for the yard that
they did its worst ^{place} collects a lot of water in
the back yard when they were done they built

(Continue comment on back if necessary)

the Natural gas pipes I Called Gray Walker he come
& ~~just~~ just look at them did not do & say nothing
I live 3 houses from the Lead Co. Since I attend the
Meeting I've learn a little bit I develop sores all over my
body around July 1998 I've gone to 5 Drs they did not know
what it was finally Dr Sam Samoni told me he did not
know but whatever it was it was in my blood, so,
when my next app Feb 6 with my regular Dr Rayen I'm
asking him to test me for lead. oh by the way whenever
they did my yard I had 3 trees & 1 lateral bush they did
not replace for 1 tree all my cement block I had they took
them & never replace them I had about 16 I call & they
never return my calls or come by.

Thank You
Mauda King

COMMENT FORM

Herculaneum Lead Smelter Site
Herculaneum, Missouri
December 14, 2000

Name: CHRISTINE M. LANEMAN & MELVALINE M. FOX

Address: 423 RESERVOIR STREET
HERCULANEUM, MO 63048

Comment: THE ORDER SHOULD BE WITHDRAWN UNTIL
THE HEALTH EFFECTS OF ALL THE PUBLIC
EXPOSED TO DOE RUO'S POLLUTANTS ARE
DETERMINED. AOC, PAGE 24; PAR. 4; LINES 2+3
STATE: "MOST LEAD ABSORBED BY PLANTS OR CONSUMED
BY ANIMALS PASSES THROUGH THEIR BODIES;
HOWEVER, THE SMALL AMOUNT ABSORBED CAN
CAUSE HARMFUL EFFECTS."

WE ARE SICK & TIRED OF BEING SICK
& TIRED ALL THE TIME. Following is a sum-
mary of our comments:

- What & How CAN THE PUBLIC GAIN ACCESS
TO: --- HAZARDOUS SUBSTANCE FUNDS
--- Federal PROGRAMS & FUNDS
--- STATE PROGRAMS FUNDS
(OVER)

(Continue comment on back if necessary)

- "TERMS OF THE AGREEMENT" SHOULD INCLUDE 151
OF HIGH LEVELS OF LEAD & OTHER METALS:
---ON THE INSIDE OF OUR HOMES & ANY CRAWL
SPACES...ect....& THE OLDER HOMES-our house is 100 yrs-
STUDY & EFFECTS ON OUR IMMUNE SYSTEMS:
---We ARE ALWAYS SICK & TIRED.
---IT IS TAKING LONGER & LONGER TO RECOVER
FROM COLDS, FLUE, INFECTIONS... ETC...
STUDY & EFFECTS ON OUR PHYSIOLOGICAL WELL BEING.
STUDY & EFFECTS ON PERMANENT LEARNING DISABILITIES
OF ADULTS:
---TOXIC EFFECTS TO THE BRAIN + CENTRAL NERVOUS
SYSTEM.
---MEMORY.
---TENSION SPAN.
POST-TRAUMATIC STRESS DISORDER.
PITUITARY TUMORS.
HORMONE DISORDER(S).
THE ORDER IS INAPPROPRIATE, IMPROPER &
INADEQUATE UNTIL THE ABOVE COMMENTS AND THE HEALTH
EFFECTS OF ALL THE PUBLIC ARE STUDIED &
ADDRESSED.
-PLEASE ADVISE CONTACT NAME, DEPT, ADDRESS
TO SEND OUR MEDICAL RECORDS & CONCERNS
TO.
-PLEASE ADVISE CONTACT NAME, DEPT, ADDRESS
TO REQUEST HAZARDOUS/FED./STATE PROGRAMS
& FUNDS.
-PLEASE ADVISE CONTACT NAME, DEPT, ADDRESS
TO REQUEST HAZARDOUS/FED./STATE EMPLOYMENT
FOR CHRISTINE M. LANEMAN 494-68-6920 WHO IS
CURRENTLY EMPLOYED WITH THE STATE OF MISSOURI.
HERCULANELLIN SHOULD HAVE THEIR OWN REP
MONITORING THE WORK TO BE PERFORMED.

LAW OFFICES OF

NEWMAN BRONSON & WALLIS

MARK I. BRONSON
MISSOURI & ILLINOIS
mbronson@newmanbronson.com

2300 WEST PORT PLAZA DRIVE
ST. LOUIS, MISSOURI 63146-3213
(314) 878-8200
TOLL FREE 1-800-962-4009
FAX (314) 878-7839

December 21, 2000

Ms. Diane Huffman
Environmental Protection Agency
Office of External Programs
901 N. 5th Street
Kansas City, MO 66101

RE: Herculaneum, Missouri

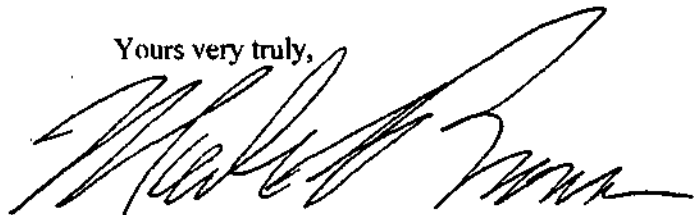
Dear Ms. Huffman:

I am hereby requesting on behalf of a number of my clients who are residents of Herculaneum, an extension of the thirty day comment period related to the Doe Run/EPA/DNR AOC. I cite the following reasons for requesting the extension, however this list is not all-inclusive:

1. Limited accessibility to documents (limited hours of viewing, limited number of copies at locations, limited access to copy machines).
2. Limited availability of documents (holiday hours will restrict access on several days during this thirty day period).
3. Citizens are still awaiting receipt of AOC copies from the Environmental Protection Agency, and may be unable to review the document until receipt of their copy.
4. Severe inclement weather has been a problem throughout the entire month of December in the St. Louis area, restricting the number of days when citizens have the ability to go to the appropriate locations.

In a letter from William Spratlin of the EPA to Herculaneum mayor Tom Griffith, Mr. Spratlin states, "This letter provides notice to you of an **imminent and substantial endangerment** presented by conditions at The Doe Run Resources Corporation (Doe Run) 881 Main Street, Herculaneum, Missouri." In consideration of such danger to the community and those points established above, it would be prudent to extend the thirty day comment period. Please advise us as to the outcome of this decision as soon as it is made.

Yours very truly,



Mark I. Bronson

MIB/lmt

COMMENT FORM

Herculaneum Lead Smelter Site

Herculaneum, Missouri

December 14, 2000

Name: Michael D. Whitter

Address: 733 Circle St.

Herculaneum, MO

63048

Comment: To whom it may concern: If I had
to sum up my whole experience with
Doe Run's past attempt to eliminate
contaminated soil from my yard, I
would strongly encourage the folks
of Herculaneum to reconsider. It is a
very over rated promise. Before the
work, I had trees, now I have none.
These trees were 50 plus years old.
My grass is junk and I have given
every effort to keep it nice. I, like
other people in my area, have given
much time, and spent many dollars on
my home to make it a nice place to
live. Included are roof, brick, siding,
windows, new driveway, seamless gutters,

(Continue comment on back if necessary)

aluminum trim, and the list goes on and on,
along with a total refurbish of the inside to
make it a lead-free environment. But
without further ado, it's a lost cause.
I personally invite anyone from EPA, MDNR,
or Health Department to come to my
house and take test samples to see the
damage that Doe Run has caused. I feel
my time and money are effortless. Doe Run
is not welcome in my yard without a
court order. Thank you.

COMMENT FORM

Herculaneum Lead Smelter Site
Herculaneum, Missouri
December 14, 2000

See ~~photo~~ snap shots
enclosed of children
exposed to Doe Run
they are all leaded by
the way - But were not
included in Doe Run's
testing ??

Name:

Betty L. Black

Address:

959 Main

Herculaneum, Mo. 63048

636-475-7286

email bettylblack@nymailstation.com

Comment: Doe Run took up soil down the street
drove it down main - crossed over the street &
dumped it over the hill (Joachim Creek bottom of
hill) - That's where the wild life gets it.

(We have snap shots of this)

Not All Children ^{under} over 6 are tested.
I ask they check my granddaughter who is 5
they didn't - When I asked why she wasn't
tested Gary Walker said "Oh she must be lost
IN the cracks"

I had her tested - she tested a (7)
Michael grandson tested (5) has seven years old
Tim " " (5) has thirteen years old
Two other little friends Jessie tested (8)
his sister Kellie tested (9)

Doe Run stated (Continue comment on back if necessary) there percentage is going down
Aug 2000 11 of 60 - 18070 -
That's (4) Children they wouldn't test ??? Because
they are right here under there nose.

over please

Woe Run States there percentage is down Not So
they buy up property & refuse to Rent to families
with children.

When the City replaced our Streets this Summer
is when the Children got infected - The streets
were dug up & all that dust - hit the air, while
the Children were playing.

Mr. Walker told me that I had no proof of
that & he is correct I don't.

But why would this happen, if it weren't
for the dust where they were playing.

They don't eat paint chips

I've lived in Herculaneum for 23 years
& it's getting worse all the time.

hope you can make some sense of this

~~Order~~
I've lost my sense of smell & do medication
daily for asthma. I can't smell the odor but
I taste it.

My granddaughter runs for the Herculaneum Tract
team - And comes in many times coughing.
This is just as bad or worse than lead in the soil

Thank you so much for your
time please keep us informed
Betty

if conditions
are so bad
was not
aware of
danger
when
home
+ HH home

Then you will probably say well
move. Well some people aren't
able financially to move.
I am able to live where I
am. That's why I bought my
house. I am not able to move.
You offered buyouts at what
price? Did you offer equivalent
to what a person has?
Did you offer to relocate that
family & its an awful small
price to pay for the life of a
child or children. Wouldn't you
say. All while you are improving
condition of your smelter.
I hope you do. Here we are
is a great community I would
hate to see it turn into
a ghost town. Of course
we all know the lead
smelter will still be
here. One of the U.S. leading
lead smelters. I don't you
dare say or try to imply
its blown all over of proportion.
The bottom line is children
are being leaded from your
smelter in the past, present
and will continue in the future
unless something is done!

(5)

my yard & knock my
air conditioner & window
out. My side door ~~has~~ is eaten
up by acid all over. And inside
we'll wipe the T.V. screen
daily and you will have
your black sample for the
day to improve the ~~condition~~
environment around
your lead smelter. Also
be sure to pick a tomato
out of your garden in your
clean yard and serve your
children for dinner. Your
plant is improving as
you say. Your children
will be fine. Your findings
say: What price do we put on
our lives and the lives of our
children. Statistics show is all I
here. Well I don't want to
be a damn statistic especially
when it's too late. Get the
families and children away.
Why are some children leaded
and others not? I don't have
the answer but I really
don't care. Because even 1, 2 or 9
children leaded matters. What
if one was your own!

the first house on the block now.
Everything gone. But where
are all the people. Look
Why? Mr. Vornberg? Because
of your lead & your plant
the dangers of living next
to your smelter over the
years. So after all this
all we want is to relocate
our family away from
your improving lead
conditions. Now all these
~~the~~ But where are we?
Still here because you
won't take responsibility
and move a family you
know you are responsible
for. Not only mine but all
the others closing living
by you. By the way Mr.
Vornberg where do you live?
It's no danger, why don't
you and some of your 400
employees live next
to your own lead smelter
& raise your family. By
the way my house is
FOR SALE with a clean yard
and patched up siding & window
where your company did

years go by and the constant exposure to lead in our bodies now is a chronic problem. Sure our levels aren't extremely high we are high enough. We shouldn't have any. Let alone more than CDC recommends. Over the years we are not only exposed to lead but Cadmium - Sulphur - acid leach. They can try to comply & improve in the mean-time we are constantly exposed to low levels of lead in our bodies. While not wanting to take any responsibility, if you would like to improve the situation then relocate the residents who live within 100 yds from your plant. No one should have to live in a closed up house - scared to come outside. I don't care if the house is falling down. Lead is still in our bodies. By the way the thriving comm. we moved in yrs ago is now gone. We are

in their bodies. Which De-Lux
addressed it immediately
with a cleaning crew to
come in my house.

They tested my house for lead. ^{to check for possible contamination}
As Mr. Vornberg did for possible
other sources. Quota paint,
Pottery, Gasoline newspaper
print, etc. What did we find?
~~then~~ Our home was full of lead.
My baler carpet 1350 mil
of lead. My back yard 600
mil of lead. Guess what they
found no other source of
lead contamination. The lead

was all over. How did my
Clean Home, it came in by
our shoes, threw over windows
and in our bodies from your
smelter. Next step De-Lux
addressed issue immediately
advised me to let them come
in and clean the lead out of
my Clean Home with a
cleaning crew from their CO. which
brought in contaminated equipment
out of their plant to clean
my home (which then we had to
replace our carpeting) It was
more contaminated, ^{than before.} As the

①

~~Page 1~~

I would like to respond to Mr. Vornberg's comments concerning The Doe Run Lead Smelter. We purchased our home in Herculaneum 14 yrs. ago right across the street from the Doe Run Lead Smelter. Moved in the neighborhood. Why? It was a thriving community. On our street a laundromat, barber shop, residential homes (across the street) Am Vest Post, Herculaneum Post Office, Tavern, apt. building all in this little section of town right across from the smelter. My husband was employed close to work. Herculaneum has a very good school system. One of the best in County. Our home was a inspected by the government home. FHA. Our dream of raising our family suddenly changed when in 1992 we were ask to submit blood tests on our children. At first hesitant insisting we were all fine. We were living the perfect American family. In the end its a nightmare! My youngest son tested high. All of my children had lead



EPA

Region 7
(Please print)

NAME Melissa Alexander
STREET P.O. Box 233 937 Main St
CITY Herculaneum STATE Mo ZIP 63048
TELEPHONE 636-247-7619

ORGANIZATION REPRESENTED _____

ADDRESS _____

TELEPHONE _____

DO YOU WISH TO MAKE A STATEMENT?

YES _____

NO _____

I'm number 12 on house map

Received 10-15-01

Ryan Shuler —

4-15-02

Helen Davis [REDACTED]

309 Main — 788, 682, 1000 PPM

Arsenic poisoning. Maybe a big smoker,
Brought in lab work.

She wants yard done sooner than schedule
She also wants to be relocated.

IT are gone. They did 3 ponds & are gone.

4-15-02

Helen Warren — [REDACTED]

411 Front, Park Hills

referred to Dave Cezard

4-19-02

Denise — Re: Helen Davis

Arsenic average ≈ 50

Arsenic at ≈ 200 is a concern

Daughter comes to CAG meetings.

Gave daughter a case study on how to
manage a patient on arsenic exposure.

Dr. tested for arsenic based on where she lived.

200 is usually over smoking, but she is
a smoker, usually over soil level too.

ATSDR will work in family.

Check on yard data. 309 Main (#501)
May need blood lead data.

4-19-02

Maxine Prasad PRASS

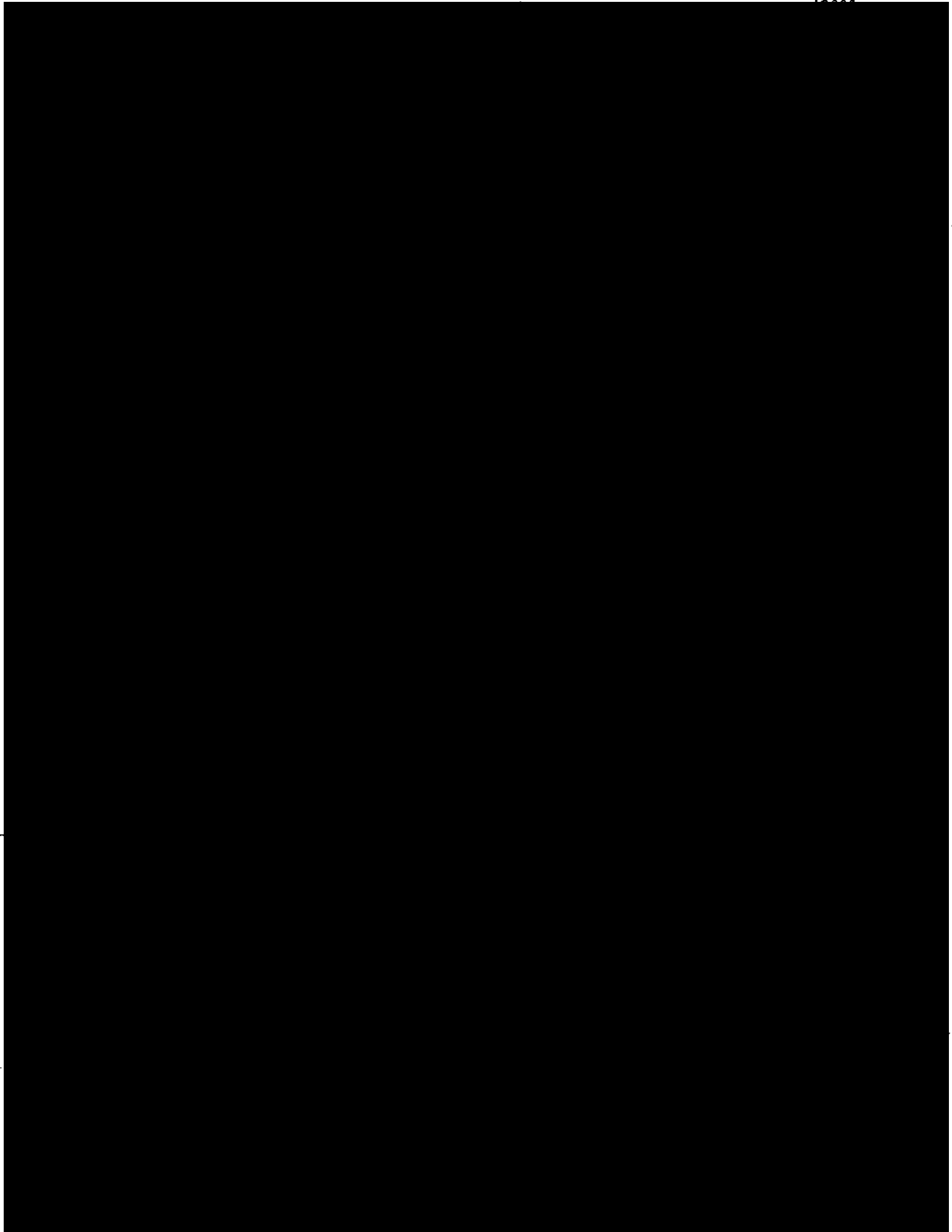
Helen is her mom.

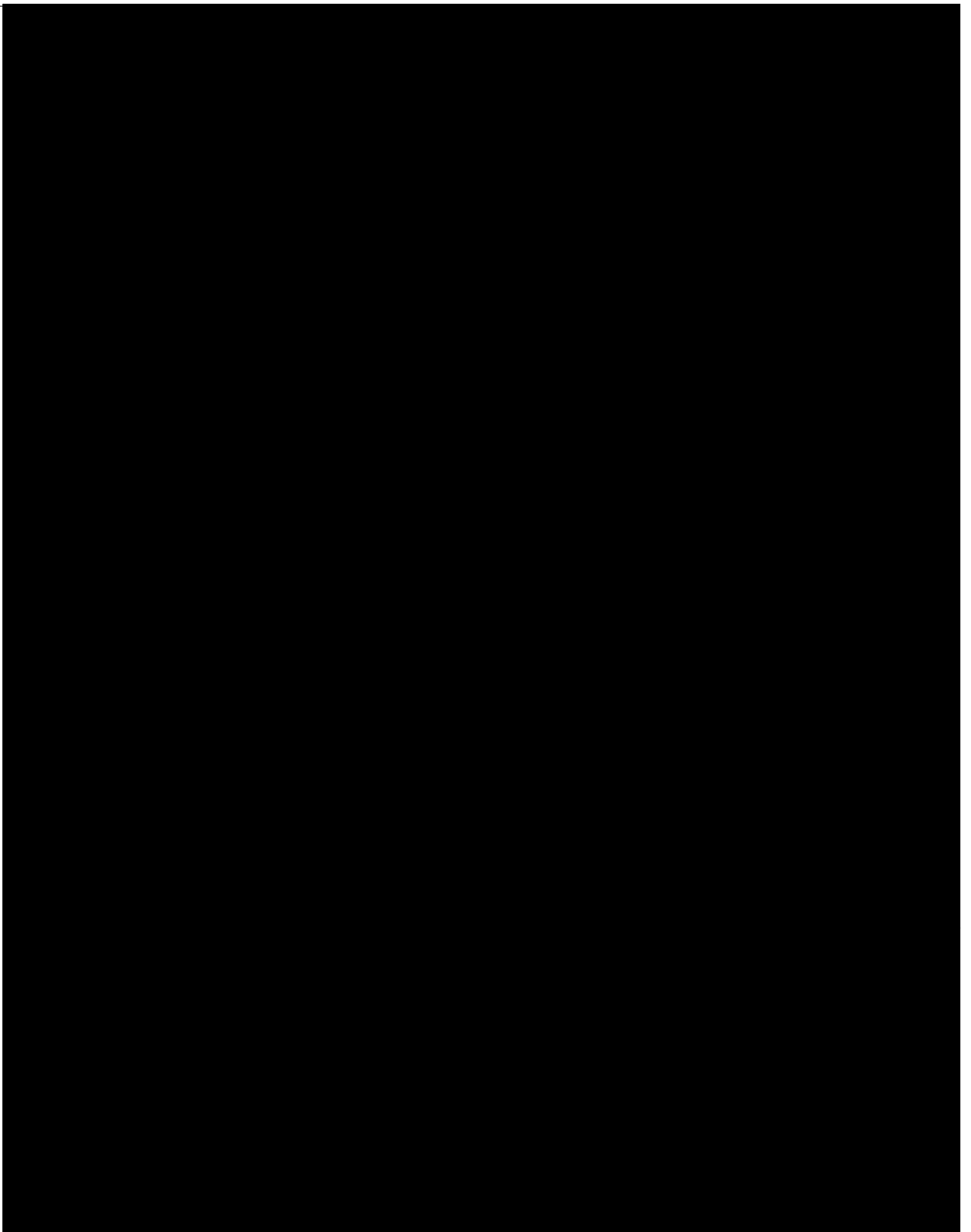
Mom's bones hurt,

Lots of dust in house.

MAXINE. PRASS @
PB.COM

Left message 4-26 @ 10:45 for mom's doctor
to contact Denise





In order for EPA to offer temporary relocation to you and your family residing at 309 Main Street, we must be able to conclude that arsenic from Doe Run's smelter is the likely source of arsenic in your urine.

We encourage you and your doctor to work with Denise Jordan-Izaguirre at ATSDR to determine the likely source of the arsenic. She can be contacted at 913-551-1310. If at any time it appears that Doe Run is the likely source of the arsenic, we will proceed to offer temporary relocation and expedite the replacement of soils along with the cleaning of the interior of your home.

If you have any questions concerning this letter, please contact me at 913-551-7637.

Sincerely,



Tony Petruska
Project Manager

cc: Ms. Denise Jordan-Izaguirre
Agency for Toxic Substances and Disease Registry (ATSDR)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION VII
901 N. 5TH STREET
KANSAS CITY, KANSAS 66101**

21 MAY 2002

Ms. Helen Davis
309 Main Street
Herculaneum, Missouri 63048

Dear Ms. Davis:

This is in response to the laboratory urine analysis report that you presented to the U.S. Environmental Protection Agency (EPA) on or about April 15, 2002.

[REDACTED]

Soil sampling of your property in November 2001, indicated lead levels up to 1000 parts per million (ppm) with arsenic in one quadrant of your yard at 7 ppm.

EPA closely works with health agencies such as the Agency for Toxic Substances and Disease Registry (ATSDR) in identifying health risks. Thus, I have discussed the above laboratory and sampling data with Denise Jordan-Izaguirre who is with ATSDR.

[REDACTED]

As I am sure that you are aware, EPA has been requiring a number of actions to be taken by the Doe Run Company to remove and reduce the exposure of residents to contaminants resulting from the smelter operation. Part of these actions include the replacement of soils and the cleaning of home interiors. In addition, EPA has offered temporary relocation to persons with young children as well as those individuals with health problems associated with exposure to contaminants from the smelting operation. This temporary relocation was offered until such time that their yards were replaced and their home interiors were cleaned

We are generally finding lead to be the most prevalent contaminant from Doe Run's smelting operation.

[REDACTED]

I just hope that a reasonable and effective agreement can be reached between all parties involved, for the sake of my family and me, and also the community, we "all" benefit from the Doe Run Co. But like in all situations you can't please 100% of the people, no matter what you do.

In closing I would just like to say that the vast majority of Herculaneum residents benefit from the Doe Run Co. And the ones that "claim" that they don't, (in my opinion) are the same ones who speak out at city hall meetings always asking for more progress and benefits, but complaining about what they already got.

Sincerely,
Larry Baiter

To whom it may concern,

Feb 1, 2001

I am a Herculaneum resident, I have lived here over two years. I also work at the Doe Run Co. I have been employed there since 1992.

My family and I enjoy living here, we use the parks, ball field, and golf course, all sponsored in one way or other by the Doe Run Co. My wife and two small children have recently been tested by the county health Dept. for lead levels in their blood, all of them were below. We live only 1.3 miles from the plant, and we have never seen or smelled any emissions. I feel that my family and myself are safe living so close to Doe Run, if I felt there was a problem, we would not have moved here.

The Doe Run Co. goes above and beyond its duty for the community in many ways. Anyone who accepts the donations & charities from the company shouldn't be opposing the company's efforts of achieving compliance to the state & EPA regulations. But it happens, I have seen it at city council meetings, and talked to other residents in the community.

It is my belief that Doe Run has maintained a strong focus on reducing emissions to the air, I have seen continuous effort over the last eight years.

→

Has anyone mentioned the
Joachim Bridge? How many
tons go over that bridge a day?
What will we do if the bridge
goes out? Will Doc Hun rebuild
a new bridge?

It is a great inconvenience to
drive approx. 5 miles out of the
way to get to my mother's house.
We need protection, now.

Smoke stack emissions The smell
is so intense you can't breathe. This
is every day! Especially on Saturday
and Sunday.

The truckers and employees throw
their trash along Brown Street.

Lots of broken beer bottles & cans.

You would think a woman of 85
years would have some quiet time
and be able to enjoy her yard. Not
in Herculaneum, MO. I live three
miles from Herculaneum on a hill and
the lead smoke permeates my space.
There is an extreme amount of cancer
surrounding this lead smelter.

Many have
died with brain cancer in this area.
We need a study done on this and
we need Doe Run to ~~stop~~ stop
polluting! Carol Thuchie Keller

1713 Poenic Drive
Hertus, MO 63028

1/17/2000

Diane Huffman
EPA Protection Agency
Office of External Programs
901 N. 5th St.
Kansas City, ~~MO~~ KS 66101

My mother lives at 747 Brown St. Berulaneum, MO. Recently I stayed with her due to an illness. The trucking company carrying concentrate started at 7:30 am. As my mother's home is on a hill on the way to Doe Run Co. you can imagine the noise and vibrations one experiences. Coleman Trucking tries to see how loud they can be. They speed-off the hill bouncing and banging.

It is impossible to talk to each other in the yard due to the noise. And trying to sit in the glider swing and enjoy the spring or fall weather is impossible due to the Doe Run

lead Poisoned. Why do Children have to have levels of ~~or~~ high to have agencies & the De Run Plant to be concerned?

I have all but given up hope to try to get help ~~as~~ ~~for~~ for getting my yard checked or area checked. I ~~live~~ live in a mobile home that is a 1980 all paneling, no copper pipes No paint except on ceiling no paint cans in or around home no hobbies that would pertain to lead. I have talked to my sons health care Provider they asked me questions on the phone to see if we ~~could~~ could find a source they saw of no sources in home from questions they asked all they could figure was it had to be from outside or the soil in my yard but no one would check. I hope an agreement can be made & something will be done for the sake of children in this area

Cathy Sullivan
909 Wiggins

he had to talk to at Doe Run & get back to me. I never heard from him until a few weeks later, then he called to get the name & # of my son to get permission to check soil in my yard & if he got permission he would come the next day & check my yard. I never heard from him again & now I receive this letter.

Everyone I talked to the health Dept. in my area the man from Doe Run, all told me I had no reason to be concerned because my son's level was not above .2.

I do not understand why a child has to have a level above .2 for someone to be concerned or to help you. I still have not received help from anyone, my son now has to have blood test every 3 months which he is due for one in January. No one in my area seems concerned so maybe the EPA & MDNR can do something before more children are

my name is Cathy Sullivan, I live in
Pevely-missouri, I live a mile and a
half from the Doe Run Plant. I have a
son who is 4 yrs old & has a high lead
level. I have made constant attempts
to try to get my yard & area around my
home checked. No one would help me, I
was told my sons level was not high
~~enough~~ enough for concern, he has a level of
a . . . I called my area health department
they would not help, then someone ~~called~~
told me to call the Doe Run plant that
they could come check my yard & area
around my home.

I talked to a Gary Walker who
is the Environmental manager. he was
a very rude man. who told me that it
(meaning in thing my son was exposed to) could
not have come from Doe Run, that test had
been done & levels were fine. this was mid
October 2000. So I believe in a way I was
lied to unless levels were not high then,
but now I receive this letter in the mail
from the EPA & MNR. So what am I to think
he eventually told me he would talk to who

Mrs Huffman,

Our granddaughter is now leaded.
New blood levels at this time are
They have reached 19 in the Summer
time while active outdoors.

In '92 we were under the impression
Hot Run was taking huge steps
to reduce the amount of toxins being
emitted into the population.

If this were true then how
in '99 & 2000 - 2001 can children
still become leaded.


It comes from Hot Run, not
from our home, both Hillsboro &
the State of Mo. has determined this.

If our Soil is removed &
replaced with new Soil, where
does this Soil come from? If
from some place in the Hot Run
Area what will this accomplish?

Residing in Hot Run continues
emitting Lead into the air, they
were supposed to clean up in
'99, how will new children
ever be safe.

Sincerely yours,
Christina McCoy

Paul A Whaley
409 Thurwell St.
Herculaneum, Mo. 63048





Paul Whaley
<paulw@usringbinder.com>

02/09/2001 01:16 PM

To: Diane Huffman/OEP/R7/USEPA/US@EPA

cc:

Subject: Comments on the Administrative order pertaining to Doe Run

Diane,

Hello Diane, I am sorry that I missed your phone call yesterday evening but I appreciate you returning the call. I am writing this e-mail to you with some comments pertaining to the situation at Doe Run. I have some serious concerns about this whole process and admittedly am not as informed about it as I should be.

Background:

I live at 409 Thurwell St. in Herculaneum and I am approximately 1/2 mile from the plant. Probably closer in "Straight Line Distance". I was born and raised in Herculaneum actually have spent about 38 years of my life in the house I live in now. I am 43 years old. I am married with 3 children, 21, 13, 10 yrs old. The house that I live in is one of the older houses in town. It is my understanding that St. Joe Lead built my house along with many others at around the turn of the century for their employees. The roof, outside walls, and the majority of the inside of my house are original.

Comments:

We are very concerned about what we read in the papers about the clean up Doe Run will be doing.

Our Primary concern is our Health, undoubtedly. We plan to all have tests to determine if there is a problem. If there is, in my opinion any consequences resulting thereafter should be the responsibility of Doe Run. This would include medical expenses, testing etc. This also in my opinion should include costs pertaining to relocation if these lead readings are to high. I have lived there the longest of anyone in my family by far, but I also have had a heart attack at the age of 38. Although naturally I cannot say that this in any way is related to lead contamination I also can't say for sure that it doesn't.

My next concern is the property that I reside at. I am not an expert but it seems logical to me that if my soil is contaminated that my house would be also. Changing the soil might be an answer for that but not for the house itself. As I said earlier my house has been there for a long time and I remember as a small child how bad the smell was playing in the yard. This of course was before the new taller stack and also well before the plant was as heavily regulated as it is now. However it is my understanding that when a company purchases another company that they are still responsible for these types of contaminations. I am afraid now that if my property is contaminated with lead that I will be forced into living there because it would make it almost impossible for me to sell at market value. If this becomes the case I feel that Doe Run should be held responsible and should be made to buy my house at that fair market price. If cosmetic construction changes to the my house could be made, ie. siding, roof, new insulation, whatever needed to clean up the contamination I feel that this should be the responsibility of Doe Run also.

I also feel that Doe Run should pay for any testing that we may wish to have done to our houses and property ourselves. We should be entitled to use testing companies of our choice so we can feel more comfortable with the results and not be responsible for the costs.

The High School, and Grade schools should be thoroughly tested also. People that may live far enough away from the plant to not be contaminated, may be sending their children to a school that is.

In closing I would like to thank you for the opportunity to make my feelings known to you and above all I hope that this whole mess can be resolved in a way that satisfies everyone involved.

Sincerely,

Woe Run States there percentage is down Not So
they buy up property & refuse to Rent to families
with children.

When the City replaced our Streets this Summer
is when the Children got infected - The streets
were dug up & all that dust - hit the air, while
the Children were playing.

Mr. Walker told me that I had no proof of
that & he is Correct I don't.

But why would this happen, if it weren't
for the dust where they were playing.
They don't eat paint chips

I've lived in Herculaneum For 23 years
& its getting worse All the time.

hope you can make some sense of this

I've lost my ~~sence~~ sense of smell & do medication
daily For asthma. I can't smell the odor but
I taste it.

My granddaughter runs For the Herculaneum Tract
team - And Comes in many times Coughing.
This is just AS bad or worse than lead in the Soil

Thank you So much for your
time Please keep us informed
Betty

COMMENT FORM

Herculaneum Lead Smelter Site
Herculaneum, Missouri
December 14, 2000

See ~~also~~ snap shots
enclosed of children
exposed to Doe Run
they are all leaded by
the way. But were not
included in Doe Run's
testing ??

Name:

Betty L. Black

Address:

959 Main

Herculaneum, MO. 63048

636-475-7286

e-mail bettylblack@ny.mailstation.com

Comment: Doe Run took up soil down the street
drove it down main - crossed over the street &
dumped it over the hill (Joachim Creek bottom of
hill) - That's where the wild life gets it.
(We have snap shots of this)

Not All Children ^{under} 6 are tested.
I ask they check my granddaughter who is 5
they didn't - When I asked why she wasn't
tested Gary Walker said "Oh she must be lost
IN the cracks"
I had her tested - she tested a (-)
Michael grandson tested (-) has seven years old
Tim " " " has thirteen years old
Two other little friends Jessie tested (-)
his sister Kellie tested (-)

Doe Run stated (Continue comment on back if necessary) there percentage is going down
Aug 2000 11 of 60 - 18.70 -
That's (4) Children they wouldn't test ??? Because
they are right here under there nose.

over please

COMMENT FORM

Herculaneum Lead Smelter Site

Herculaneum, Missouri

December 14, 2000

Name: Sue Dawson

Address: 310 Main Str.

Herculaneum, MO 63048

Comment: I think that Doe Run should be responsible for clean-up of any contaminants such^{as} lead, slag, etc. I am glad that the EPA, Health Dept. and other agencies have stepped in to see that Doe Run cleans up Herculaneum plus surrounding communities.

My youngest son Tommy Dawson had a high lead count at the age of 6 months. The Health Dept stepped in and tested the yard plus other places. The yard tested around 2,400 in 1994.

Even though I live outside the 1/4-1/2 mile radius, I would like to have my yard replaced with less contaminated soil as soon as possible. The distance that I live from the plant should not influence when I get my yard done. My son is now 7 yrs. old

(Continue comment on back if necessary)

but likes to play in the dirt.

(7)

Lead is a silent killer, in more ways than you can imagine. We have no recourse of action, but if someone would have given me the information I have now, when I just bought an old house some 10 yrs ago, perhaps things could have been different. You people have a large responsibility set upon you. Don't let the whitewash of what seems to be fool you. Look close at these people & recognize the circle, even generational it's not normal it's not do to Etirical, Economic, or any other synario, its lead.

Thank You
Gregory G. Bieber

P.S. I know I've gotten to personal perhaps in this, perhaps to opinionated, and for sure somewhat prejudice please excuse me. but - this is a very serious matter. If I can help you in any way please feel free to contact me.

last but not least, in 1997 my wife became pregnant & we were blessed in May with has been tested several time for lead by Jefferson Cnt Health Dept. He has been as high as 14 tent before. The nurse told us he is going to have learning disabilities due to it. He's A beautiful little boy like Dust was. They say he will never live to his potential due to the lead. What A Shame Thanks Doe Run.

Anyway, I have tried selling our house on 3 occasions, ~~then~~ No go. Now the EPA is here, good & bad. Maybe they'll make Doe Run Accountable, but selling the house now is next to impossible due to delinquent documentation of Environmental problems in Area, who would buy it now?

I won't try to blame all of life's problems on lead, some things or due to bad choices, that is true, but it makes you wonder what kind of choices we would make if some bugs (~~and~~ pain, confusion, stress & health worry) weren't biting you in the butt.

I hope that this brief description of what is at stake here, this circle has been going on here for generations, ~~at the time~~

④

I have given up my technical career due to some joints, tiredness, depression, Alcoholism, drug Abuse, I was advised by a doctor about 5 years ago to find a new kind of work I have been doing the same thing for 20 years plus. I said he thought I had arthritis in my back, shoulders, legs, knees, etc. No real explanation for the tiredness & probably, I was just getting old. I eat a lot of vitamins & Exercise. Have sought counseling but still have a lot of physical pain & am still low on energy. I had a head test & yep. My wife basically had the same symptoms & problems. We both still lay in bed at night with back & joint problems. It's like a real deep ache, along with a lot of head aches. Unexplainable pains & thought confusions, which sometimes leads to a lot of frustration.

to the case of Herculaneum. He told me that it was slag from the lead smelter. That they use to use it for all kinds of neat stuff around here. Sinders on the street in the snow, leveling yards, leveling concrete, filling in holes, base for driveways. Just about Everything where rock or dirt was needed cause it was free, & there was lots of it. I asked him if this night ~~to my stop by at night~~

have anything to do with the black soot in the basement, attic & even in the walls. Bill said that when he moved here in the 60s even in the 70s still, that alot of times the fog & smoke from the lead smelter was so thick that you couldn't even see the neighbors house hardly. I guess that would account for why that old house of mine was so filthy.

Anyway, I guess it still didn't quite register in my head, due to ignorance to it, that over the past 2 years working on this house with me & my family ^{in it} was having adverse affects on all our lives.

Somewhere over the next couple years Dustins grades starting falling off & his zest for life seemed to fade. He said he had cramps in his hands alot, that he didn't understand what they were saying @ school, became

After that I got involved in floor tile + carpet removal, guess what, black again. OK there some reason for all this but I don't get it yet. Next I had a brain storm to put in an Attic fan so with trusty saw in hand I started cutting a hole in the dining room ceiling & boy did I take a bath in that same old blacksoot. It was & still is so thick up there that theres no way anyone ~~at~~ could go up there without choking to death. I'm still ignorant to what or why this place is so damn dirty. Well anyway that old concrete patio in the back of the house that is all cracked up. I decided to remove & replace with new concrete. So with sledge hammer & pick in hand I go to work. As I'm busting up the old concrete my pick keeps coming out with black dirt on it. The more concrete I remove the more it becomes visible to me that there is some kind of leveling of sand or something all underneath this. When removed, yep, there it all is this beautiful black sand about 1 foot or more deep leveling & used for footing for the concrete. I was rather curious about it so I ASKED a neighbor who had been living here since the 60s about it. That was when I got woke up

Gregory G. Nieber
453 Thurwell

(636)4

1

Herculeum MO 63048

(2)

I bought property in Henky in 1989. ~~The house~~
~~was in pretty bad shape~~ With my wife EVE who about ^{was}
30 yrs old at that time my oldest son Dustin about
or so then & me 35 or so then. We all were
basically in good health then. I was employed in
the ~~industry~~ industry, EVE a nurse & Dustin in
4th grade with good grades & attendance.

The house was in pretty sad shape
with a lot of repairs needed & I was going to
take the challenge & I thought opportunity to
improve our lives somewhat with a home of
our own. I had to make some basic repairs
before occupying the residence to meet local
building inspections. I.E. plumbing, electrical
windows etc. Upon completing these in the first
month we obtained building inspections & moved in.
There was still much to do, walls were in bad
shape, floors unfinished, broken concrete, old
heating system with 12" duct running all over
basement. So I began consistently renovating as
we lived in the home, one area at a time. Upon
removing some of the old duct & heater, there was
real black soot over & inside all the pipes & in the
flv, naturally, I thought due to heating & airflow.
I would come out of the basement looking like a
coal miner. After that I started ripping out some
of the walls & redoing them. Well guess what
the same black soot in the walls. Same same

THE ORDER IS INAPPROPRIATE, IMPROPER AND
INADEQUATE UNTIL ALL THE HEALTH AND
CONTAMINATION ISSUES ARE CORRECTED
AND MADE AVAILABLE FOR PUBLIC REVIEW.

PLEASE MAIL THE FOLLOWING TO CHRIS
LAWMAN, 423 RESERVOIR ST., HERCULANEUM,

MD 63048:

ADMINISTRATIVE ORDER ON CONSENT (AOC);
TOXIC REPORTS OF: ARSENIC

CADMIUM

COPPER

LEAD

NICKEL

SILICA

AND ANY OTHER HEAVY METALS
OR CONTAMINANTS.

LOCATIONS WHERE CONTAMINANTS ASSOCIATED WITH
THE SMELTING OPERATION HAVE BEEN FOUND,

ENCLOSED, SPREAD, BURIED, DEPOSITED, RELEASED
AND RUNOFF ON DURING THE 100 PLUS YEARS

THE DOE RUN LEAD SMELTER FACILITY
IN HERCULANEUM HAS OPERATED;

STATUTES OF LIMITATION.

HISTORICAL THROUGH CURRENT MAPPING,
ELEVATION, SURVEYS OF LOCATIONS WHERE

CONTAMINANTS ASSOCIATED WITH SMELTING
OPERATIONS HAVE BEEN FOUND AND/OR

THE DOE RUN LEAD SMELTER FACILITY
HAS OWNED DURING THE 100 PLUS YEARS

OPERATION; SEVERE RESPIRATORY INFECTION
AND THOR INFORMATION.

INFORMATION SESSION

THURSDAY 2-1-2001

4:00 PM - 7:30 PM

HERCULANEUM AT

UNITED METHODIST

CHURCH FELLOWSHIP

HALL

MAILED 2-3-2001

COMMENT FORM

Herculaneum Lead Smelter Site

Herculaneum, Missouri

December 14, 2000

EXTENDED THROUGH 2-9-2001

Diane Huffman
EPA Region 7, OEP
901 N. 5th Street
Kansas City, Kansas 66101

Name: CHRISTINE M. LANEMAN & MELVALINE M. FOX

Address: 423 RESERVOIR STREET

HERCULANEUM, MO 63048

636-479-9220

Comment: THE ORDER SHOULD BE WITHDRAWN
UNTIL THE HEALTH EFFECTS OF ALL THE PUBLIC
EXPOSED TO DOE RUNS POLLUTANTS ARE
DETERMINED, CORRECTED AND MADE AVAILABLE
FOR PUBLIC REVIEW.

AND

THE "HAZARDOUS SUBSTANCE SUPERFUND" AND
ANY OTHER FEDERAL/STATE PROGRAMS/FUNDS
ARE EXPLAINED AND MADE AVAILABLE TO THE
PUBLIC.

AND

RESIDENTIAL CLEANUP RESULTS ARE STUDIED
AND IT IS PROVEN THAT ALL ENVIRONMENTAL
AND CONTAMINATION ISSUES ARE DETERMINED,
CORRECTED AND MADE AVAILABLE FOR PUBLIC
REVIEW.

(Continue comment on back if necessary)

(OVER)

Doe Run continue to try and meet the air quality standards (NAAQS). This includes testing to the easternmost part of the plant and to the east side of the Mississippi River in addition to the testing currently being done on the west side of the plant. Testing on the west side of the plant should include monitoring stations at each school and park within five miles distance of the plant. Testing should be upgraded to 365 days per year and with testing stations to be monitored and results recorded periodically each day.

Doe Run be required to use trains and/or barges to bring in all concentrate from the south. That the State offer to fund 60% (with Doe Run paying 40%) of the cost of a bridge over Joachim Creek near the present train bridge on Doe Run property. That Doe Run build a road (truck route) from U.S. Hwy 67 to it's facility on it's own property south of Joachim Creek.

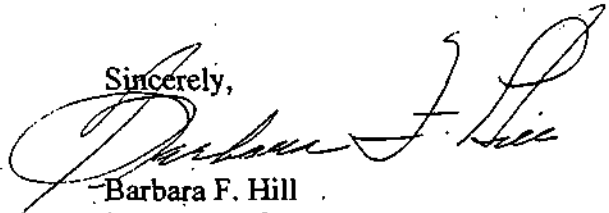
Doe Run either extract the valuable material from the slag and then ship the remainder (within a year) from the present site or just remove the slag (and ship it via barge to a final site) from the area of Joachim Creek (starting immediately and finishing within one calendar year).

Doe Run ship its products out via rail or barge.

Doe Run be more aggressive in getting people to sign up for the blood testing program.

Doe Run contract an independent source check the lead and other pollutants levels in the replaced lawns at least biannually and report to the EPA. School playing fields and parks within five miles distance of the plant should be tested for soil contaminants at least biannually.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Barbara F. Hill', written in dark ink.

Barbara F. Hill
747 Brown St.
Herculaneum, MO. 63048
(636) 479 5652

11 January 2001

Dianne Huffman
Environmental Protection Agency
Office of External Programs
Kansas City, KN. 66101

Dear Ms. Huffman,

I received a call from City Hall telling me that the EPA has allowed more time for comments re: the Doe Run Company. Since my last letter to you on 1 January 2001, a couple of other items have come to my attention.

Doe Run tells us in *Neighbor Notes* that its \$1.5 million barge unloading project will (time frame is not projected) cut the truck traffic for concentrate by 30 percent/year depending on world economics. This means if it's cheap enough from foreign sources they will buy some but if not they will use concentrate from southern Missouri. So the barge facility may or may not help the trucking problems. The 30 percent equates to 4,500 round trip trucks per year. **This means that we are now getting 15,000 round trips just for receiving concentrate.** The barge unloading facility will only relieve the trucking of concentrate and refined lead that is bought from abroad and now unloaded in St. Louis and trucked south. It will not relieve the 10,500/year truck loads (or 202 truck loads/week) received from the south (Hwy 67 to Joachim St. south end to Brown St. to Station St. to so. Main St. and into the plant) via Coleman Trucking (and its subcontractors) which is the greatest problem.

Doe Run is also touting the \$1.5 million spent on preparing the SIP. Most of this money was spent on computer modeling, sampling and engineering. We do not know if these expenditures will have any beneficial effects on pollution. The plans to install three new baghouses by August 2002 may help the airborne pollution but do nothing for other contaminants being emitted. Doe Run says that these new baghouses will increase the plant's filtering capacity by 57 percent but we still don't know how much this will reduce the air pollution. They also tell us that they have spent \$850,000 to upgrade the sulfuric acid plant. We do not know if the upgrade to benefit the smelting process will reduce emissions or not. We do not know what improvements in emissions, if any, any of these changes will bring.

Although Doe Run says that the company spends millions of dollars **each year to reduce pollution**, it appears to me that this \$3.85 million being discussed is being spent over a four to five year period of time and this equates to less than a million a year. This does not mean that the expenditures are not appreciated they are **just insufficient** to address all the hazardous pollutants from Doe Run.

I would like any SIP to include (in the following order) that:

Doe Run be denied permits relative to storm water and slag storage.

I just hope that a reasonable and effective agreement can be reached between all parties involved, for the sake of my family and me, and also the community, we "all" benefit from the Blue Run Co. But like in all situations you can't please 100% of the people, no matter what you do.

In closing I would just like to say that the vast majority of Hercules residents benefit from the Blue Run Co. And the ones that "claim" that they don't, (in my opinion) are the same ones who speak out at city hall meetings always asking for more progress and benefits, but complaining about what they already got.

Sincerely,
Darryl Baiter

To whom it may concern;

Feb 1, 2001

I am a Herculaneum resident, I have lived here over two years. I also work at the Doe Run Co. I have been employed there since 1992.

My family and I enjoy living here, we use the parks, ball field, and golf course, all sponsored in one way or other by the Doe Run Co. My wife and two small children have recently been tested by the county health Dept. for lead levels in their blood, all of them were below 3. We live only 1.3 miles from the plant, and we have never seen or smelled any emissions. I feel that my family and myself are safe living so close to Doe Run, if I felt there was a problem, we would not have moved here.

The Doe Run Co. goes above and beyond its duty for the community in many ways. Anyone who accepts the donations & charities from the company shouldn't be opposing the company's efforts of achieving compliance to the state & EPA regulations. But it happens, I have seen it at city council meetings, and talked to other residents in the community.

It is my belief that the Doe Run has maintained a strong focus on reducing emissions to the air, & have seen continuous effort over the last eight years.

→

Jan 29, 2001
400 Old State Rd So.
Pevely, Mo. 63070
Telephone 636-479-519

Attention: Diane Huffman

About Doe Run lead smelter facility in
Herculaneum, I have a comment about them.

I live about 2 miles from them, in the
town of Pevely. At times when I'm outside,
I get this awful taste & smell, (mostly taste) from
the air, when the breeze is blowing this way.
This has happened through all the years, that
I have lived here. It is so bad it makes
me nauseous. I cannot stay outside, I
have to go in the house.

It happens at different times, from
early morning to late evening.

I do not believe they do much to
control the air pollutants.

Sincerely

Glenda Dixon

DOE RVN SHOULD BUY OUT THE PEOPLE WHO WANT
TO SELL THEIR PROPERTY. IN THE EFFECTED AREA.

WE MOVED TO HERCULANEUM IN MARCH 1999 DID NOT
KNOW ABOUT THE LEAD IN THE AIR ETC.

MY WIFE & I MOVE HERE BECAUSE OF HEALTH PROBLEMS
TO BE CLOSER TO OUR DOCTORS & HOSPITAL

IT NOW LOOKS LIKE WE HAVE MOVED
INTO A HEALTH HAZARD.

COULD NOT ATTEND THE MEETING, BECAUSE OF ~~SICK~~ ILLNESS

COMMENT FORM

JAN 9, 2001

Herculaneum Lead Smelter Site
Herculaneum, Missouri
December 14, 2000

Name: ALFRED WRIGHT

Address: 589 MAIN ST.
HERCULANEUM, MO. 63048

636-475-7538

Comment: ① BLACK GRITTY DIRT ON SIDING OF GARAGE, CAR, TRUCK,
CAMPER, ETC.

② CANT KEEP DUST AND BLACK GRITTY DIRT OFF PORCHES

③ CANT SIT ON PORCH IN SWING BECAUSE OF SMELL LIKE SULPHUR

④ TRUCKS ON MAIN ST. ALL THE TIME DUST JUST FLYING

⑤ STREET SWEEPER DOES NOT PICK UP ALL DIRT ON STREET, SOME TIMES
BRUSHES & WATER ARE NOT PUT DOWN, EVEN IF THE BRUSHES
ARE ROTATING YOU HAVE TO CLOSE YOUR DOORS & WINDOWS
TO KEEP THE DUST FROM COMING IN.

⑥ AFTER READING THE POST DISPATCH ON DEC. 28, 2000

ABOUT LEAD SMELTER CLEANUP POLLUTIONS IN HERCULANEUM

& STATEMENTS MADE BY TONY PETRUSHA EPA PROJECT MANAGER

ABOUT THE DANGERS FROM LEAD FROM SMELTER IN AIR & THAT THERE
WERE HEALTHIER PLACES TO LIVE. IF THIS IS
CORRECT THEN WHAT ABOUT OUR PROPERTY
VALUE.

(Continue comment on back if necessary)

OVER

3.

Has anyone mentioned the
Joachim Bridge? How many
tons go over that bridge a day?
What will we do if the bridge
goes out? Will Doc Hun rebuild
a new bridge?

It is a great inconvenience to
drive approx 5 miles out of the
way to get to my mother's house.
We need protection now.

Smoke stack emissions The smell
is so intense you can't breathe. This
is every day! Especially on Saturday
and Sunday.

The truckers and employees throw
their trash along Brown Street.
Lots of broken beer bottles & cans.

You would think a woman of 85
years would have some quiet time
and be able to enjoy her yard. Not
in Herculaneum, MO. I live three
miles from Herculaneum on a hill and
the lead smoke permeates my space.
There is an extreme amount of cancer
surrounding this lead smelter. I am
a breast cancer survivor. Many have
died with brain cancer in this area.
We need a study done on this and
we need Doc Run to ~~stop~~ stop
polluting! Carol Thukie Keller
1713 Oceanic Drive
Hertus, MO 63028

1/17/2000

Diane Huffman
E.P.A. Protection Agency
Office of External Programs
901 N. 5th St.
Kansas City, ~~MO~~ K.S. 66101

My mother lives at 747 Brown St. Herculaneum, MO. Recently I stayed with her due to an illness. The trucking company carrying concentrate started at 4:20 am. As my mother's home is on a hill on the way to Doe Run Co. you can imagine the noise and vibrations one experiences. Coleman Trucking tries to see how loud they can be. They speed off the hill bouncing and banging.

It is impossible to talk to each other in the yard due to the noise. And trying to sit in the glider swing and enjoy the spring or fall weather is impossible due to the Doe Run

Mrs Huffman,

Our Shondalyn is now leaded.
Her blood levels at this time are 10.

They have reached 19 in the Summer
time while active outdoors.

In '92 we were under the impression
Hot Run was taking huge steps
to reduce the amount of toxins being
emitted into the population.

If this were true then how
in '99 & 2000 - 2001 can children
still become leaded.

It comes from Hot Run, not
from our home; both Hillsboro &
the State of Mo. has determined this.

If our Soil is removed &
replaced with new Soil, where
does this Soil come from? If
from some place in the Hot Run
Area what will this accomplish?

Besides if Hot Run continues
emitting lead into the air, they
were supposed to clean up in
'92, how will our children
ever be safe.

Sincerely yours,
Christina McCoy

1526 Harness Road
Festus, MO 63028
8 February 2001

Dianne Huffman
Environmental Protection Agency
Office of External Programs
901 N. 5th Street
Kansas City, Kansas 66101

RE: Doe Run Company - AOC

Dear Ms. Huffman,

This letter is written in support of Doe Run Company's efforts at Herculanum Missouri in their extensive and persistent efforts to meet Federal standards for lead emissions. As you know the 1.5 micrograms per cubic meter lead in air standard was issued in the early 1970s. This level was set significantly lower than any health data either at that time or since that time could justify, with the reasoning that it was better to be too low than not low enough. Also at that time no lead industry in the world situated in a similar urban area met those standards. In fact no lead smelter in the world situated as Doe Run is in Herculanum meets those standards today as nearly as Doe Run does with only one station barely out of attainment over the last 16 quarters.

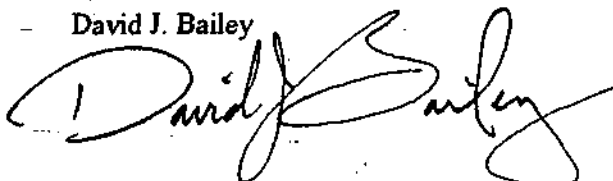
As an engineer I have personally watched, contributed to, and been involved with the steady decrease in emissions through application of BAT projects at the Herculanum lead smelter. I have personally worked on various projects to improve the emissions of the plant while attempting to keep the company commercially competitive in a difficult global market for lead, such as exist today with record low world lead prices. It seems that all too often the US government is willing to crush US industry only to have business move to or increase production of these "exact" same goods in other countries where the environment means nothing. I am appalled at EPA's lack of global environmental concern. Doe Run's Herculanum plant is so close to achieving absolute attainment, it is un-imaginable that you would consider putting Doe Run's Herculanum's plant out of business only to increase lead emissions in under-developed countries... that is what you are proposing! The estimated \$12 to \$15 millions dollars in less than two years is unreasonable and unjustified.

I also believe EPA's sudden declaration of a "crisis" at Doe Run's Herculanum plant, and the resulting AOC places an undue economic hardship on Doe Run at a time that is potentially economically disastrous is a blatant "wrong" to the American public. This expenditure will have negligible positive impact on the general health of the population living in the area of Herculanum.

In conclusion, I believe EPA has missed its goal and mission by asserting undue hardship on the Doe Run Company's Herculanum plant. I believe the time period to implement the terms of the AOC should be extended in a reasoned manner such that the American public benefits from both better health conditions, and better economics conditions of employment. Thank you for considering these comments.

Sincerely yours,

David J. Bailey

A handwritten signature in dark ink, appearing to read "David J. Bailey", with a stylized, flowing script.



Paul Whaley
<paulw@usringbinder
.com>

02/09/2001 01:16 PM

To: Diane Huffman/OEP/R7/USEPA/US@EPA

cc:

Subject: Comments on the Administrative order pertaining to Doe Run

Diane,

Hello Diane, I am sorry that I missed your phone call yesterday evening but I appreciate you returning the call. I am writing this e-mail to you with some comments pertaining to the situation at Doe Run. I have some serious concerns about this whole process and admittedly am not as informed about it as I should be.

Background:

I live at 409 Thurwell St. in Herculaneum and I am approximately 1/2 mile from the plant. Probably closer in "Straight Line Distance". I was born and raised in Herculaneum actually have spent about 38 years of my life in the house I live in now. I am 43 years old. I am married with 3 children, 21,13,10 yrs old. The house that I live in is one of the older houses in town. It is my understanding that St. Joe Lead built my house along with many others at around the turn of the century for their employees. The roof, outside walls, and the majority of the inside of my house are original.

Comments:

We are very concerned about what we read in the papers about the clean up Doe Run will be doing.

Our Primary concern is our Health, undoubtedly. We plan to all have tests to determine if there is a problem. If there is, in my opinion any consequences resulting thereafter should be the responsibility of Doe Run. This would include medical expenses, testing etc. This also in my opinion should include costs pertaining to relocation if these lead readings are to high. I have lived there the longest of anyone in my family by far, but I also have had a heart attack at the age of 38. Although naturally I cannot say that this in any way is related to lead contamination I also can't say for sure that it doesn't.

My next concern is the property that I reside at. I am not an expert but it seems logical to me that if my soil is contaminated that my house would be also. Changing the soil might be an answer for that but not for the house itself. As I said earlier my house has been there for a long time and I remember as a small child how bad the smell was playing in the yard. This of course was before the new taller stack and also well before the plant was as heavily regulated as it is now. However it is my understanding that when a company purchases another company that they are still responsible for these types of contaminations. I am afraid now that if my property is contaminated with lead that I will be forced into living there because it would make it almost impossible for me to sell at market value. If this becomes the case I feel that Doe Run should be held responsible and should be made to buy my house at that fair market price. If cosmetic construction changes to the my house could be made, ie. siding, roof, new insulation, whatever needed to clean up the contamination I feel that this should be the responsibility of Doe Run also.

I also feel that Doe Run should pay for any testing that we may wish to have done to our houses and property ourselves. We should be entitled to use testing companies of our choice so we can feel more comfortable with the results and not be responsible for the costs.

The High School, and Grade schools should be thoroughly tested also. People that may live far enough away from the plant to not be contaminated, may be sending their children to a school that is.

In closing I would like to thank you for the opportunity to make my feelings know to you and above all I hope that this whole mess can be resolved in a way that satisfies everyone involved.

Sincerely,

Mrs. Diane Huffman,

I have a great concern with Doe Run going to barge traffic to ship its Oreo Concentrate up the Mississippi River. How fast can any one government agency or agency respond to a sinking barge and stop contamination of our river way. Who will ever see that all safety precautions are in place at all times and make sure mishaps are reported, because in the past Doe Run does not report all incidents until after the fact. We have had acid spills that are airborne and are not reported until days after the fact.

We have a problem with the truck traffic in times of concentrate being brought in. Concentrate comes out the rear gate of the trucks and becomes on the streets. The concentrate becomes airborne as dust.

I have great concerns with the way they keep blood lead levels down. Instead of taking care of the problem, they just rent properties out and rotate people out of the homes close to company. What about those of us that live here and don't rent, if there is not a problem with the air we breathe than do employees have to be respirators when they are working outside of the plant.

Another concern is Doe Run has been volunteering to clean up yards, but the problem is they are doing such a horrible job that fewer people are having them do it. What happens no one lets Doe Run replace his or her yards.

Why don't they have the Herculaneum High School football field tested for contamination? Not just the high school students use the field we have the Junior Football League, Jets Track, which ranges from the age of 8 years old to 11 years old. Elementary students also come over to use the field. We also have new construction going on by the elementary playground, for a new high school building.

There are concerns over the slag pile next to the Joachim Creek and Mississippi River. Not only lead but other hazardous mineral that are reaching into the air and ground water and river ways.

There are many other concerns that need to be addressed such as the stack-noise pollution and other air pollution such as sulfur, which makes it hard for children to breathe in the summer when they are outside playing.

Thank You,
James Donnelly, Jr.

To: Tony Petruska-EPA

Re: Doe Run Cleanup

Date: February 9th, 2001

After only being a Homeowner to the Herculaneum community for a 1-½ years, I am quite disturbed to find out that I have moved my two children to a lead toxic zone!

Not once did the realtor of this house expose the lead environment issues, why would they, it would mean money out of their pockets. But of course the question about "lead" on the disclosure statement only pertains to "lead paint", nevermind that I will not be able to let my kids go out side and play in the dirt now. Is lead paint more toxic in paint than in the air and dirt?

Don't get me wrong, I like the community and my neighbors in Herculaneum, that is what attracted my husband and I to this area. It is a community with a lot of traditional values and where people are still true neighbors to each other.

I just do not understand "why" this company is allowed to continue business as usual. Why do they not have to install the better emission controls and make sure it works before they can continue operation?

Everything I have heard and read says that the lead is in the whole food chain. It's in the creeks, the fish, the wildlife, and not to mention our children and adults in the Herculaneum area. Again I shake my head in disbelief that this has been allowed and is still occurring.

I thought government agencies like the EPA were set in place to help and protect the community! It appears to me that "red tape" has again reared its ugly head towards Big Business. They have been allowed to hide the true facts from the community for far to long. As a consequence they should be shut down until Doe Run and the EPA can guarantee the publics safety. If not for the adults, at least for the children of this community.

I would like to know when the property of 200 Joachim will be tested for its "possible" lead contamination. If it is scheduled for testing, what date will it be done and how long after that will it be resurfaced? This residence is in a 1 mile radius from the stack and I have not been informed yet of any such testing.

Thank you for your time,

Lynette Steidley-Toohey
200 Joachim Ave

February 5, 2001

Diane Huffman
Environmental Protection Agency
Office of External Programs
901 N. 5th Street
Kansas City, KS 66101

Debbie Curtis
690 Glenwood Drive
Pevely, MO 63070

Re: Herculaneum Lead Smelter Site

Diane,

I would like to start with a Thank You for the concern you have taken for the residents of Herculaneum.

I have a comment on the residential yard clean-up. It is true that Doe Run has sampled and replaced soil in the yards near the smelter. But Doe Run should be responsible for replacing your soil as well as the grass growing prior to removal. And I don't mean whatever grass seed they have on hand. Some of the yards appear to have more weeds growing than grass.

I agree the contaminants must be removed, but Doe Run should have some obligation to the residents that are being directly affected by toxins and/or other pollutants.

The air emissions will be a great relief as well. The air is thick with suet (lead particles) even blocks away. While in town you should inspect some of the nearby residential homes and pay close attention to the dirty windows and siding on homes. This is a build up of suet (lead particles) covering homes for several blocks. Just think how much contamination reaches the inside of homes.

I hope the air emissions is closely monitored and controlled better than any efforts put forth in the past (if any).

The major concern here is that it has been speculated that Doe Run had an acid spill in the earlier part of the year 2000. Allegedly, all employees with paint damage to their vehicle was compensated with money, and told to keep silent.

The alleged acid spill was never brought to the attention of any surrounding residents. Is there any way to check into this matter?

This is not a matter of compensation, but a matter of health and well being for all surrounding residents.

Perhaps Doe Run should be forced to buy out homes within a reasonable perimeter of the plant.

Sincerely,

Debbie Curtis

1/31/01

US EPA
Region VIII
901 North 5th St.
Kansas City, Kansas 66101

To whom it may concern:

In regards to the Herculaneum Lead Smelter Site,
881 Main St. Herculaneum, MO.

I think the Doe Run Co. should be commended for doing what they are to help solve a problem that was created years ago, and trying to keep pollution down during present manufacturing. After all, a lot of the waste disposal years ago was not considered a hazard and now all of a sudden it is. I can recall years ago, the state, county, and individuals would get slag to spread on roads during winter icing conditions. I don't think we can condemn the company for the past. They are making an effort to correct the problems, and also are reducing pollution during present manufacturing.

The company provides employment for many people, and this is needed. We need the products they manufacture. If fines are levied, or to strict standards are required, it will make the end product cost more. The company would have to charge more for the products, so in the end, you and I would be paying for expenses.

We need to use common sense in trying to solve these problems.

Sincerely -
Walt Jende

VII. With the amount of dangerous contamination to the property nearest to the plant, the value of homes has been drastically reduced. Some formula should be agreed on to reimburse the residents for the devaluation of their homes. Many homeowners in Herculaneum bought their homes before the extent of the damage caused by the emissions was known.

VIII. Residents should be offered blood testing to be done by an independent medical facility. Blood should be monitored for more than dangerous lead levels. The emissions are varied and some contain carcinogenic hazards. The number of residents having cancerous tendencies should be researched and documented for further consideration.

The items described above are a very real concern to the residents living near the Plant. Research and testing have been needed for a very long time. Now that the dangers are known, quick action seems appropriate. Cleanup's can take a very long time and while we wait, the emissions continue.

Yours Truly,

A handwritten signature in cursive script that reads "George Garver". The signature is fluid and extends to the right.

Mr. and Mrs. George Garver
957 Church St.
Herculaneum, Mo. 63048

cc:file

January 27, 2001

Ms. Diane Huffman
Environmental Protection Agency
Office of External Programs
901 N. 5th Street
Kansas City, MO. 66101

Dear Ms. Huffman:

Please find below my "Comments on the Administrative Order on Consent" in the matter of Doe Run Resources Corporation, Herculaneum, MO.

Please acknowledge and enter these comments into record:

- I. More attention should be directed toward cleaning the streets and sidewalks on the truck routes and in the neighborhoods close to the Plant.
- II. Since there are acid spills, there should be tests for more than lead. If there is an acid spill, the community should be notified. Residents with allergies should be better able to prepare for these unsafe spills.
- III. The acid spills also affect the finishes on automobiles and will eat into the *finishes of our homes if it is not washed off as soon as it occurs*. If we were notified immediately, it wouldn't be as bad.
- IV. Other communities that have had soil replaced in their yards have received sod as a replacement. Grass is very slow to grow in the replacement soil that was used in our yards. Either the soil is very poor or it contains contaminants that prevent grass from healthy growth. It is my belief that the soil should have been replaced with sod.
- V. Birds and small animals (squirrels, rabbits) have always made a home in our neighborhood until the soil was replaced this year. Now there is practically no wildlife to be seen. It makes me wonder why!
- VI. Emissions should be monitored daily and a report available on a regular basis for the community to have access to. An independent entity should be responsible for reading the emissions and reporting it (unsafe levels of emissions) to the company, the residents of Herculaneum, and the proper agency.

JANUARY 29, 2001

~~FREEDOM OF INFORMATION ACT REQUEST STAFF~~
U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

Diane Huffman
EPA Region 7, OEP
901 N. 5th Street
Kansas City, Kansas 66101

RE: HEALTH AND ENVIRONMENTAL ISSUES RELATED TO
DOE RUN'S LEAD SMELTER OPERATION
LOCATED AT 881 MAIN STREET, HERCULANEUM, MO 63048
FREEDOM OF INFORMATION ACT REQUEST

PURSUANT TO THE FEDERAL FREEDOM OF INFORMATION ACT, I HEREBY
REQUEST A COPY OF ALL RECORDS HELD BY U.S. ENVIRONMENTAL
PROTECTION AGENCY (EPA) PERTAINING TO HEALTH, WELFARE AND/OR
ENVIRONMENT ENDANGERMENT DUE TO THE ELEVATED LEVELS OF LEAD,
ARSENIC, CADMIUM, AND OTHER METALS ASSOCIATED WITH THE SMELTING
OPERATION THAT MAY RESULT IN TOXIC EFFECTS TO THE BRAIN AND
CENTRAL NERVOUS SYSTEM.

SPECIFIC (AS POSSIBLE) REQUEST: EXPOSURE AFFECT ON ADULTS:
LEARNING DISABILITIES, PITUITARY DISORDERS (INCLUDING TUMORS,
HORMONAL, IMMUNE SYSTEM, FATIGUE, PROLACTIN EXCESS, MENTAL
DISTURBANCES AND STRESS REACTION PROBLEMS), ASTHMA, ALLERGIES,
BOWEL DISEASES, KIDNEY DISEASES, SEIZURES, HEADACHES/MIGRAINES,
MEMORY PROBLEMS, CHANGES IN TISSUES UNDER THE SKIN CAUSING
PURPLE STREAKS AND GALLBLADDER PROBLEMS ISSUES BROUGHT TO THE
ATTENTION OF DOE RUN AND/OR THE FEDERAL/STATE GOVERNMENT.
EXPOSURE AFFECT ON 423 RESERVOIR ST., HERCULANEUM, MO 63048
HUMAN HEALTH, ENVIRONMENTAL AND CONTAMINATION ISSUES RELATED TO
AIR, SOIL, GROUND WATER, SURFACE, WETLANDS, PUBLIC WATER,
CENTRAL SEWERS AND STRUCTURES (HOME & GARAGE) BROUGHT TO THE
ATTENTION OF DOE RUN AND/OR THE FEDERAL/STATE GOVERNMENT.

SINCERELY,

Christine M. Laneman
CHRISTINE M. LANEMAN
423 RESERVOIR ST.
HERCULANEUM, MO 63048
1-636-479-9200



Ursuline Provincialate

210 Glennon Heights Road - Crystal City, Missouri 63019-1199
Telephone 636-937-6206
FAX 636-937-7627

Diane Huffman
U.S. EPA Region 7, Office of External Programs
901 N. Fifth Street
Kansas City, KS 66101

January 5, 2001

Dear Ms. Huffman,

We are writing in regard to the new agreement that has been reached by the EPA, DNR and the Doe Run Company in Herculaneum Missouri. As owners of the property adjacent to the Doe Run Company, we have long been concerned about the pollution at this site. Even though there have been past agreements the fact that Herculaneum is not meeting federal air standards is a grave concern.

Of even greater concern is the elevated lead levels in the fish and birds of the area due to the slag pile. It would seem that if the company is truly concerned about reducing emissions this issue would have been addressed before now so that the waste generated would be safely contained. No one who has even the most elementary knowledge about the causes of pollution could think that allowing that sort of contamination in an unprotected area would have no effect and therefore not need to be addressed. If it took outside monitoring for this to be noticed by the company and addressed responsibly, then outside monitoring is definitely necessary.

Replacing soil and testing blood for town residents does not exempt Doe Run from reducing emissions and waste seepage so that there is no danger to residents of the town or neighbors. We believe that they have a corporate responsibility not "to operate as well as we can and to have the least amount of impact on the community and environment possible" as stated by the vice president of law for the company, but to operate within the strictest standards that can be set by the EPA and DNR. If it is impossible for them to operate this way, then, in our opinion, they need to close down until they find a way to do it. One indicator of this would be the lack of need to replace the soil in the future because it would no longer be contaminated. We agree that the company should voluntarily continue to monitor soil and blood levels for lead.

Sincerely yours,

Ursuline Sisters, Crystal City, Missouri

S. Mary Leppin
S. Susan Kienzler
S. Pauline Lorch
S. M. Agnes Horne

8 Pevely Sq #B

DEC 28 2000

Pevely MO
Dec. 26, 2000Pevely 63070-2967
HAZARDOUS WASTE PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

Dear Karen Case,

I commend you for letting the citizens of this area share our concerns about the environmental pollution of Doe Run.

When the wind blows from the East - now that the stack is higher - the pollution covers Pevely - when the wind blows from the north the pollution reaches Crystal Heights & Crystal City. Sometimes we are forced to stay indoors. We do not open our windows at night in case there is another acid spill.

Polluted air is hazardous to our community. We have had a big increase of other industries also - adding their pollution.

I have lived at Pevely Sq. Complex since Dec. 1983. I can remember when it was a pleasure to breathe the air. Many of my neighbors as well as myself have developed breathing difficulty.

Thank you for allowing us to take part in this project.

Sincerely yours,
Margaret Brown

Complete old maps of the town of Herculaneum (available through the Bonne Terre Farming & Cattle Company or The Doe Run Company) should be obtained to identify the location of slag deposits throughout the existing town. Community members have noted large, concentrated slag deposits in their yards from pre-existing waste piles and such concentrated piles of toxins should be identified before any remediation is undertaken. Interviewing of local residents by state or federal regulators (unrelated to Doe Run or its agents) might determine specific areas of concern in addition to historical map review. The historical Herculaneum maps should be made available to the public and included in the administrative records for review. Information related to this investigation should be included in each community meeting and written progress reports. Identification of such concentrated areas of lead and other contaminants should warrant immediate notification to the residents affected. Extensive testing in the area of concern should result, and all results from the testing lab should be forwarded to the head of household for each home affected. Handwritten results should be not given to residents, rather, the original lab report which includes each sample result should be sent to the resident. Complete and careful remediation to a level that extensive testing reveals less than 200 ppm, should determine the depth of remediation, which should exceed twelve to eighteen inches of soil.

The Order denotes no measures for restriction of Joachim Creek from fish consumption, body contact and recreation during the remediation period. The AOC notes that creek contamination has been established; signs should be posted ordering users to not swim or eat fish taken from the creek until all measurements taken by state and federal authorities verify that there is no risk to users.

The Order denotes no measures for restriction of the Mississippi River adjacent to and downstream of Doe Run from commercial fishing, recreational fishing, drinking water consumption or body contact. If tests confirm contamination, protective measures should be taken to restrict most or all of these activities during the remediation period (and beyond if necessary).

All labs, lab workers, remediators, contractors or any other agent for The Doe Run Company who is participating in any way in the handling of contaminated materials, should have a current, valid license and be fully accredited (having taken the complete program of accredited coursework) in hazardous waste removal/handling. Both project coordinators (EPA and DNR) should verify that all contractors are in fact licensed or certified and it should be The Doe Run Company's responsibility to insure that all information pertaining to the license or accreditation of each individual is provided to the EPA and DNR project coordinator. This should be an enforceable requirement and severe penalty should arise from any false or misleading information that is given to the EPA or DNR project coordinators. Standard protocols concerning chain of custody should be routinely followed by all persons involved in the cleanup project, and this information should be readily available to the public if requested.

One person (completely unrelated to Doe Run or its agents) should be assigned to oversee the coordinated effort of the agencies involved. The project coordinators should report to this individual regarding problems and progress. This person should coordinate weekly meetings to update progress of the project, and open monthly meetings for the community for same. The monthly community meetings should be equally accessible to all residents through notification by direct mailing to the entire zip code of 63048. In addition, the St. Louis Post-Dispatch, Jefferson County edition and the smaller local papers should also be notified of each monthly meeting which should occur during the evening, to insure the likelihood that a greater number of residents will attend. A minimum of one hour should be allowed for the residents to comment on the project. A written progress report may be provided for attendees and those who request it to be mailed to them. If a progress report is provided at the monthly meeting for residents, it should also be available on the EPA's website on World Wide Web for easy accessibility.

Any "Responsiveness Summary" should be made available on the EPA's website on the World Wide Web, as well as sent to all locations where the administrative records are kept and should be mailed to all residents in the zip code area of 63048.

The air monitoring system in Herculaneum has not been amended to accommodate the possible additional contamination of ambient air during the remediation process. The monitoring system is grossly inadequate as it presently exists for current purposes. Additional toxins should be measured in ambient air during the removal of contaminated soil, the increase in truck traffic, and the disturbing and moving of contaminated soil. An air lead monitor should be placed on South Main Street or Church Street; each monitor during the project process should be a continuous twenty-four hour, seven day a week monitor and not an every sixth day sampling monitor. The additional monitors should be owned, checked and maintained by a state agency or its agent, in no way related to The Doe Run Company or any of Doe Run's agents. As well, additional monitors should be placed throughout town (including in addition, a cadmium monitor on South Main or Church Street) and should measure lead and cadmium as these toxins may become airborne during the remediation process. Additional air sulphur monitors should be located in the community, southwest, west and northwest of the plant. There exists anecdotal evidence that sulphur dioxide exceeds the air standards in Herculaneum. Since concentrations as low as 2 ppm can produce asthma attacks and there is a link between SO₂ and cancer, anecdotal evidence warrants further investigation and placement of additional monitors to measure air concentrations in different sections of Herculaneum during this project and perhaps into the future. Complete calibration and equipment checks should be immediately undertaken at all existing air monitors, by state or federal agents, to insure that no monitors have been altered or tampered with in any way and will effectively monitor emissions during the process. Also, all well water within a five mile area should be routinely measured for lead, cadmium, zinc and arsenic during the project and periodically thereafter. A control well in another township (unaffected by smelting activity) with similar geologic identifiers should be used as a comparison or control source. Under no circumstances should any well in Herculaneum be used as a control since it would likely be affected from smelting activity and the potability of the tested wells could be placed in jeopardy.

The Order notes that Doe Run shall "evaluate" measures to manage releases from the slag pile "while it is still in operation". This does not put into consideration the placement of liners beneath the pile (the lack thereof which has resulted in contamination of ground water) or any other permanent solution to what is a ready source of airborne contamination. Neither do most of the measures suggested take into account detrimental effects on the community from wind conditions, flooding etc. In addition, Doe Run is mandated through the Order to "consider operation and maintenance (O&M) needs in response to incidents that will likely occur over the lifetime of the facility including major earthquakes and floods". Rather, Doe Run should provide a written plan with contingency measures in the event of fire, flood or earthquake as related to the slag pile. This plan should be readily available at the guard shack, laboratory, main office building and public library. In addition, an air lead monitor should be placed at the edge of the slag pile on Hill Street, to measure exposure to the residents on that street as they are continuously exposed to airborne toxins from the huge piles of slag.

temporary accommodations should be made for the residents, if needed, at a local hotel, and a kennel for the family pets, as long as is necessary before returning to their home. In addition, a professional remediator licensed or accredited in lead abatement should be provided to vacuum attics and basements with a HEPA vac to rid of lead dust that may have accumulated during the course of lead deposition in the town of Herculaneum, after the removal of the contaminated carpet and before replacement of the new flooring or carpet. All proper protocol should be followed during this procedure so further contamination does not occur.

Guidelines should be given regarding the placement of contaminated soil. Information regarding placement of soil (either temporary or permanent), containment technique, or proximity to residential areas has not been released. The location of contaminated soil should be clearly identified before any activity is begun. Local residents should be allowed an appeal process to contest a location that might be of concern or threat to their well-being or property value. These appeals should be reviewed by all government agencies involved in the project and alternative sites examined. It is of no sense to relocate contaminated soil from one residence to close proximity of another. The AOC notes concentrations of lead in soils "that could migrate or be released by windy or rainy conditions". This issue should be paramount when selecting a permanent location. Therefore, the contaminated soil should be relocated to a secured location that is at least one mile from the residential area which is already adversely affected by this toxin and others. A straw or vegetative "cover" does not equate remediation nor make the area free from further hazard to the community.

Guidelines have not been identified regarding truck traffic during the remediation and soil removal process. An increase in truck traffic poses new problems to this already overwhelmed community. Additional funding should be given to the Street Department to maintain the roads in proper condition relative to usage. It has not been made clear if trucks will be accessing the community streets or following an alternative route. Regardless, the trucks carrying contaminated soil should always be secured with a tight tarp or contained securely in another similar manner. Again, accommodations should be made that allow residents to place anonymous phone calls to report uncovered trucks or those driving erratically or too fast. Swift and severe penalties must adjoin reckless driving with contaminated soil, and parameters regarding this type of policy must be clearly identified and communicated to every driver in advance of the project. During past remediation projects in Herculaneum, trucks have lined up, in essence parking, for up to twelve hours per day in front of Hill Street residents' homes to dump uncontained, contaminated soil down the hill on the south side of the street. The noise, diesel exhaust and invasion of privacy in addition to potential exposure to airborne toxins has created certain and unnecessary hardship and health concerns of those residents. Guidelines which address these issues should be clearly identified before any action is taken, and contaminated soil should not be merely dumped alongside a street, but proper disposal without disturbing, invading or threatening the health of other residents should be insured. In addition, truck traffic, noise or exhaust should not disrupt the private lives of the citizens of Herculaneum. A project manager (unaffiliated with Doe Run) should be on-site during remediation at all times to insure that proper protocol is followed.

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such as cadmium and zinc, or information on how the testing will be done. As chronic lead poisoning (rather than acute) is the problem of concern in Herculanum, a continuous dosage of lead air emissions in combination with soil lead places the class of residents at greater risk than exposure to soil lead singularly. Therefore a lower soil lead guideline should be maintained than is typical protocol. Such issues such as chronic exposure are of particular importance when "clean soil" sources are being considered. The source of the soil should not be from Herculanum or any similarly contaminated town (Leadwood, Bonne Terre, Boss, Viburnum) in the region, as other constituents in addition to lead have been found at increased levels in those areas. Every truckload of "clean" soil should be checked from several different points (and not averaged) for lead, cadmium and zinc and likewise for other contaminants that may pose a significant health problem to residents (such as PCBs or dioxins). In addition, at the community meeting a DNR official noted that vegetable gardens in Herculanum should be a source of concern as long as the top eighteen inches were not replaced. In consideration of this project manager's professional opinion, remediation should therefore include the top eighteen inches of soil rather than the top twelve. The residents of Herculanum should have the choice to grow edible, uncontaminated vegetables if they so desire. This would warrant an eighteen inch removal depth. Also, protocol should be established to insure that at least eighteen inches were removed, rather than a visual estimate by a forklift operator. (Err should be made in favor of more remediation rather than less.)

Guidelines have not been given regarding specific measures to restrict dust during the soil remediation process. Protocol should be mandated by the regulators prior to remediation and adhered to by Doe Run and its agents during the project. Local residents should be made aware of the proper protocol so they can report any suspect or inappropriate activity to proper authorities. In addition, conclusive information is needed addressing risk factors of the soil replacement program before any action is taken. Such information should be made readily available to residents of the community.

Arrangements should be made to replace carpeting throughout every home where the outside soil was found to have high levels of lead or cadmium. Residents should be given an opportunity to refuse either carpet or soil replacement. If they accept carpet replacement, carpeting should be minimum of average quality and of at least equal quality to the carpet which already exists in the home. Recommendation should be made by the Health Department to the homeowner to replace carpeted areas inside the home with wood, tile or linoleum flooring, which should also be made available as an alternative selection. Unless the carpeting is replaced, contaminated soil which was tracked into the home before the remediation, will allow continued exposure to toxins. The contractor or company removing the contaminated carpet should be accredited or licensed in lead abatement, and proper protocol for removing lead-contaminated carpeting should be strictly adhered to. Following both the carpet removal and later the replacement, a clean-up team licensed or accredited in toxic waste handling and abatement should go in and thoroughly clean the house interior, vacuuming all furniture, draperies, stuffed toys, etc. and wash down walls, cabinets, furniture, shelving, etc. During the course of carpet replacement,

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Guidelines are not given regarding additional training and supplementation of information to the Missouri Department of Health regarding lead exposure from sources other than lead paint, such as air emissions. The Missouri Department of Health is thoroughly trained in addressing such issues as home contamination from sources such as paint, pottery etc., but their scope is far too narrow to effectively address contaminated ambient air as a source of lead poisoning. Extra funding earmarked specifically to obtain additional training on this far less common type of lead poisoning is warranted in this case. Otherwise, the community suffers a further injustice by an inability on the part of the Department of Health to address their specific and unique issue. In addition, if the Department of Health is not properly trained and fully equipped to address other toxins in the soil, air and water such as cadmium, zinc, arsenic and sulphur dioxide, then the ATSDR should be instrumental in the remediation process and at ready hand in the community to address citizen concerns, particularly since several of these toxins are known carcinogens.

Further, contaminants other than lead (e.g. cadmium, sulfur dioxide, zinc) should be tested in the ambient air, soil, water and blood to obtain a clearcut picture of the extent of contamination in the community. Review of the data as cited in the AOC or in the most recent Doe Run TRI show an array of contaminants and widespread contamination in Herculaneum and the surrounding areas. This is further evidence that testing should be required for **all** congeners of concern, and not limited to lead. At minimum, cadmium should be tested in blood and ambient air since it is a known carcinogen and residents expressed concern for the high cancer rate in the community at the public meeting held on December 14, 2000.

The AOC does not establish in writing a program for chronic after-hours releases of contaminants that the residents identified as being a serious problem in Herculaneum at the public meeting. The AOC should establish such a program which should include a toll-free hotline number where anonymous calls can be made to report any problematic or suspicious activity on the part of Doe Run or their agents. In turn, the reported activity **should be immediately investigated** and acted upon by such agency. Ideally, this program would be coordinated by a state agency (entirely separate from Doe Run or its agents) which should have the ability to respond quickly and immediately to the call. Protocol should be established in the event that illegal or problematic activity is confirmed; identification of the party to whom the investigator reports the activity and penalties should be pre-determined. Documentation of such activity should be maintained in files and should be made readily available to the public upon request. Contingency measures should also be in place, and a coordinated widespread effort should be made to insure that the community is aware of the program and it is made fully accessible to them at all hours.

It is noted in the AOC that soil remediation will entail removing the top twelve inches of residential soil and replacing it with "clean" soil. The source of the "clean" soil has not yet been determined per Tony Petruska, USEPA. It was noted that the "clean" soil would be tested to determine the lead level. There is no stipulation that the soil will be tested for other constituents

**Comments on the Administrative Order on Consent in the Matter of The Doe Run
Resources Corporation, Herculaneum, Missouri**

January 03, 2001

Throughout the AOC and in a letter to Mayor Tom Griffith, the EPA repeatedly notes an "imminent and substantial endangerment" presented by conditions at Doe Run in Herculaneum. Throughout the public meeting where information was provided on the proposed agreement, officials responded to numerous questions with responses such as "that is not clearly defined", "that is not yet determined" or "a response should be known shortly". There were many important questions brought up by community members for which the agencies involved obviously do not have a comprehensive response at this time. It is therefore impossible to specifically address weaknesses in those areas for which little or no information was given. As a general response, guidelines should be clearly defined before the public comment period is concluded, so those issues may also be addressed in writing.

First and foremost, community concerns were expressed at the public meeting regarding age guidelines (children age six and under) as determined in the AOC for lead screening. Acknowledging a peak of hand to mouth activity at the age of two, it seems clear that this common type of toddler activity was the consideration used in setting the age limit of six years of age as is often used in protocol for determining lead poisoning. In this circumstance, however, this guideline is wholly inappropriate given that lead exposure to Herculaneum residents is comprised mostly of leaded air emissions in which the lead is inhaled rather than placed in the mouth from the fingers. With this in mind, and since children absorb a much higher percentage of lead than do similarly exposed adults, it is imperative that all school-age children age eighteen or younger residing in or attending school in Herculaneum be tested for lead. Neither is lead screening appropriate in this circumstance, since there is overwhelming evidence in the AOC Findings of Fact that every child in Herculaneum is clearly at risk for lead poisoning and "imminent and substantial endangerment" as determined by several Federal and State agencies including the EPA and ATSDR. Therefore, there is no need to identify whether each child is at risk, since the AOC already indicates risk to the children in Herculaneum. Furthermore, these guidelines do not address children who have been exposed to toxins other than lead, including cadmium, zinc and sulfur dioxide. Such toxins can be far more damaging than lead, and should not be ignored. Blood testing should be instituted without screening and should include identification of lead, cadmium and zinc levels.

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January 03, 2001

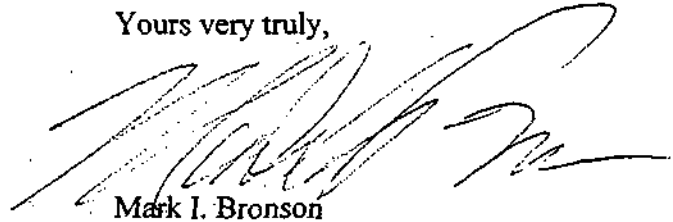
Ms. Diane Huffman
Environmental Protection Agency
Office of External Programs
901 N. 5th Street
Kansas City, MO 66101

RE: Administrative Order on Consent-The Doe Run Resources Corporation, Herculaneum

Dear Ms. Huffman:

Enclosed are "Comments on the Administrative Order on Consent in the Matter of The Doe Run Resources Corporation, Herculaneum, Missouri." I represent a number of residents of Herculaneum with claims arising out of exposure to lead and other toxins emitted by the Doe Run facility. Please enter these comments into record.

Yours very truly,



Mark I. Bronson

MIB/lmt

Enclosure

W. Michael Pashia
109 Jackson Trace
Festus, Mo. 63028

December 30, 2000

DIANE HUFFMAN
Community Involvement Coordinator
U. S. EPA Region #7
901 N. 5th St.
Kansas City, Kansas 66101

Dear Ms. Huffman,

I have been reading the recent press coverage of the Doe Run Company and EPA's agreement to begin/continue the efforts to make Herculaneum and the surrounding area a more livable place. I have been a life-long resident of the area, with the exception of the 4 years I spent attending college. I truthfully believe that I have some thoughts, experiences and opinions that you should lend an ear to.

First; I am not a wacked out tree hugger, bent on demonizing big business of all types. I grew up in the city of Herculaneum. My mother was a three term mayor and 2 term alderman in the city, who fostered a positive working relationship with the Doe Run Company during her tenure that was always open. I have the good fortune to have a father-in-law who is a retired graduate chemist. He held numerous management and senior management positions with companies like US Steel and Firestone Rubber before his retirement 11 years ago. He had positions on various pollution boards and had ultimate authority concerning pollution control as a top level corporate manager. My cousin was an executive secretary to the Plant Manager at Doe Run for almost 20 years before she left, three years ago. So, it is not without knowledge that I approach you.

There are things though that must be addressed. Among those are the Doe Run Company's ability to manipulate the test results of concern. Has anyone in your area contacted Dr. E. G. Verzola about his experiences with the testing procedures and the company's ability to make the results not only public, but also informing the employee of the true results? If not, why not? His extensive and conscientious history as the Physician to many employees should be valuable to your study. Why is it that the EPA has not been vigilant to the practice of company shutting down various monitoring stations according to wind direction? It is common practice for the stations to be on-line only when the wind direction blows toward the smelter. With the prevailing wind being westerly, what about the testing stations in Illinois? Why does the smelter only complete the most noxious polluting on Holidays and in the night? The people of this community deserve a relatively clean environment and it is your job and RESPONSIBILITY to see that this is done

I sincerely hope that you have the fortitude and honesty to turn the opinion of the local populace. For now, that opinion and confidence in the government doing the right thing is almost a myth.

Sincerely
W. Michael Pashia



lead Poisoned. Why do Children have to have levels of 20 or high to have agencies & the De Run Plant to be concerned?

I have all but given up hope to try to get help ~~as~~ ~~for~~ for getting my yard checked or area checked. I ~~live~~ live in a mobile home that is a 1980 all paneling, no copper pipes No paint except on ceiling no paint cans in or around home No hobbies that would pertain to lead. I have talked to my Sons health care Provider they asked me questions on the phone to see if we ~~to~~ could find a source they saw of no sources in home from questions they asked all they could figure was it had to be from outside or the soil in my yard but no one would check. I hope an agreement can be made & something will be done for the sake of children in this area

Cathy Sullivan
909 Wiggins

he had to talk to at Doe Run & get back to me. I never heard from him until a few weeks later, then he called to get the name & # of my trailer park owners to get permission to check soil in my yard & if he got permission he would come the next day & check my yard. I never heard from him again & now I receive this letter.

Everyone I talked to the health Dept. in my area the man from Doe Run, all told me I had no reason to be concerned because my sons level was not above 20.

I do not understand why a child has to have a level above 20 for some one to be concerned or to help you. I still have not received help from anyone, my son now has to have blood test every 3 months which he is due for one in January. No one in my area seems concerned so may be the EPA & MDNR can do something before more children are

my name is Cathy Sullivan, I Live in
Pevely Missouri, I live a mile and a
half from the Doe Run Plant. I have a
Son who is 4 yrs old + has a high lead
level. I have made constant attempts
to try to get my yard + area around my
home checked. No one would help me, I
was told my sons level was not high
~~enough~~ enough for concern, he has a level of
a 15. I called my area health Department
they would not help, then someone ~~called~~
told me to call the Doe Run plant that
they could come check my yard + area
around my home.

I talked to a Gary Walker who
is the Environmental manager, he was
a very rude man, who told me that it
(meaning in thing my son was exposed to) could
not have come from Doe Run, that test had
been done + levels were fine this was mid
October 2000. So I believe in a way I was
lied to unless levels were not high then,
but now I receive this letter in the mail
from the EPA + MDR So what am I to think
he eventually told me he would talk to who